

# Quality Assurance Project Plan

## Brownfield Program

November 2016



### **Operations Division Cleanup Section**

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DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.



State of Oregon  
**Department of  
Environmental  
Quality**

## Quality Assurance Project Plan: Brownfield Program

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# 1. Project Management

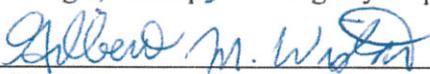
## 1.1. Approval Sheet

  
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**Lydia Emer**  
Administrator, Operations Division

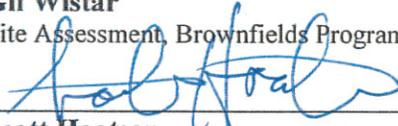
Date 12-5-16

  
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**Bruce Gilles**  
Manager, Cleanup and Emergency Response Program

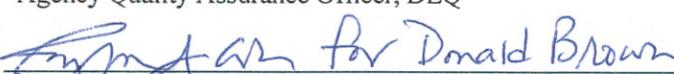
Date 12-5-2016

  
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Date 11/28/16

  
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**Scott Hoatson**  
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Date 12/6/16

  
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Date 12/20/16

  
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Date 12/20/16

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## 1.3. Distribution List

The following DEQ personnel will be emailed regarding all aspects of this QAPP/SAP. Final reports from the third party laboratories will be faxed/emailed and mailed to the Project Manager (PM), Laboratory Project Manager (LPM). Final reports from the DEQ laboratory may also be faxed/emailed and mailed to the PM, and LPM and data coordinator.

This QAPP will be posted on DEQ's Cleanup program documents web page <http://www.deq.state.or.us/pubs/reports.htm#Cleanup> as well as internally on Q-Net (DEQ's internal website) at <http://deqsps:808/lab/documents.asp>. As prescribed by the laboratory's document control procedures, the official signed document will be filed at the DEQ laboratory. This project is expected to continue through multiple years, thus revisions should be anticipated. The PM may make revisions to this plan, which must be approved by the signatories on the approval page. The DEQ is not responsible for the control of reprinted copies from web sites or photo copies of the original plan. It is the responsibility of the reader to ensure that they are using the most current QAPP. DEQ's Quality Assurance Officer (QAO) will replace posted network files as the plan is revised.

**Table 1-1 – Distribution List**

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## 1.4. Acronyms

°C	Degrees Celsius (or centigrade)
CCV	Continuing Calibration Verification
CFR	Code of Federal Regulations
DEQ	Oregon Department of Environmental Quality
DI	Deionized (as in deionized water)
DQL	Data Quality Level

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DQO	Data Quality Objective
ECSI	Environmental Cleanup Site Information (DEQ's Cleanup program database)
EPA	Environmental Protection Agency (or USEPA)
HASP	Health and Safety Plan
HCID	Hydrocarbon Identification method
HCl	Hydrochloric Acid
HNO <sub>3</sub>	Nitric Acid
H <sub>2</sub> SO <sub>4</sub>	Sulfuric Acid
ISM	Incremental Sampling methodology
ITRC	Interstate Technology and Regulatory Counsel
LCS	Laboratory Control Sample
LIMS	Laboratory Information Management System (Also called ELEMENT™ developed by Promium)
LEAP	Laboratory and Environmental Assessment Program
LOD	Limit of Detection
LPM	Laboratory Project Manager
LUST	Leaking Underground Storage Tank (DEQ's Cleanup program database)
MB	Method Blank
MCL	Maximum Contaminant Limit
MDL	Method Detection Limit
MI	Milliliter
MOM	Mode of Operations Manual
NELAP	National Environmental Laboratory Accreditation Program
NIST	National Institute of Standards and Technology
NWTPH	Northwest Total Petroleum Hydrocarbon methods
ORELAP	Oregon Environmental Laboratory Accreditation Program
OSHA	Occupational Safety and Health Administration
Oz	Ounce
PAH	Polynuclear Aromatic Hydrocarbons
PCB	Polychlorinated Biphenyls
QA	Quality Assurance
QAO	Quality Assurance Officer
QAPP	Quality Assurance Project Plan
QC	Quality Control
QL	Quantitation Limit – (sometimes referred to as Limit of Quantitation (QL) or Reporting Limit (RL))
QMP	Quality Management Plan
RBC	Risk Based Concentration
RCRA	Resource Conservation and Recovery Act (EPA)
RPD	Relative Percent Differences
SAP	Sampling and Analysis Plan
SDS	Safety Data Sheet
SOP	Standard Operating Procedure
SVOC	Semivolatile Organic Compounds
TAL	Target Analyte List
TCLP	Toxicity Characteristic Leaching Procedure
TNI	The NELAC Institute
USGS	United States Geological Survey
VOC	Volatile Organic Compounds

WQM Water Quality Monitoring  
WRD Water Resources Department

## 1.5. Definitions

**Brownfield Site:** A brownfield is a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant...

**Sampling Event:** A group of samples collected and/or shipped under a single chain of custody; by an individual or individual sampling team (usually a single day's sampling activity).

## 1.6. Project/Task Organization

Brownfield site investigations may involve DEQ staff or contract staff outside the agency, including:

- Brownfield program staff at headquarters;
- DEQ regional office staff;
- Environmental contractors;
- Laboratory contractors; and
- DEQ Laboratory Division staff.

### 1.6.1 Brownfield Program Staff at DEQ Headquarters

Brownfield program staff at DEQ's headquarters office will:

- Provide policy oversight and training;
- Provide technical assistance; and
- Secure funding.

### 1.6.2 DEQ Regional Office Staff

Brownfield program staff in DEQ's regional offices will:

- Serve as Project Managers for Brownfield projects, and in some cases secure funding as well;
- Develop site-specific Sampling and Analysis Plans (SAPs), assemble project teams, implement field work, and coordinate sample analyses for Brownfield projects;
- Train environmental contractors on the requirements of this Brownfield Quality Assurance Project Plan (QAPP) and site-specific SAPs;
- Review and approve site-specific SAPs (and potentially QAPPs) prepared by DEQ's environmental contractors performing work for the agency on Brownfield projects;
- Oversee environmental contractor field implementation, including sample management, for Brownfield projects;
- For projects performed by DEQ staff, communicate project Data Quality Objectives (DQOs) to contract laboratories analyzing samples collected during Brownfield projects;
- Assess laboratory performance in satisfying the specified project DQOs;

- Initiate technical assessments of the performance of environmental contractors and contract laboratories as needed; Prepare and/or review reports evaluating and summarizing Brownfield site activities, sample results, and further-action needs, if any; and
- Update DEQ's Environmental Cleanup Site Information (ECSI) or Leaking Underground Storage Tank (LUST) databases in a timely manner.

### **1.6.3 Environmental Contractors**

Within the scope of their project involvement, environmental contractors conducting field work for Brownfield site assessments will:

- Develop site-specific SAPs in accordance with this QAPP, working closely with the DEQ Project Manager;
- Communicate DQOs to contract laboratories analyzing samples collected during Brownfield projects;
- Assemble project teams, implement field work, and coordinate sample analyses;
- Verify the proper functioning of all equipment before beginning field activities;
- Ensure that the proper number, type, and quantity of sample containers, including preservation requirements, are available for field activities;
- Follow standard sampling protocols as defined in this QAPP or in the site-specific SAP;
- Record all field data in the manner specified in this QAPP;
- Following applicable Standard Operating Procedures (SOPs), ensure that all samples are collected, preserved, labeled, packaged, and shipped to laboratories in an appropriate manner; and
- Prepare reports evaluating and summarizing Brownfield site activities, sample results, and further-action needs.
- Perform data validation as required for project.

### **1.6.4 Laboratory Contractors**

Contract laboratories analyzing and reporting on samples collected for Brownfield projects will:

- Understand and follow DQOs outlined in this QAPP and site-specific SAPs;
- Perform requested analyses using appropriate test methods specified in the QAPP and SAP;
- Satisfy all laboratory and analytical Quality Assurance/Quality Control (QA/QC) objectives and activities;
- Prepare laboratory reports for the DEQ project manager or environmental contractor project officer, including all relevant data and QC reports;
- Communicate any analytical problems, issues, or concerns to the DEQ project manager and/or environmental contractor in a timely manner; and
- Initiate corrective action when deficiencies in sample collection, preservation, handling, test methods, or documentation are identified internally, by the contract laboratory, or by the DEQ project manager.

## **1.6.5 DEQ Laboratory and Environmental Assessment Program (LEAP) Staff**

DEQ's LEAP staff will:

- Assist in the preparation and evaluation of site-specific SAPs and DQOs;
- Provide technical assistance as needed to agency or contractor staff;
- Assist with training on proper sample collection, preservation, handling, and documentation requirements;
- File and maintain originals of the approved Brownfield QAPP;
- If requested, perform required test methods on samples in accordance with this QAPP;
- Prepare laboratory reports and/or QA reports for DEQ project managers, if requested;
- Review contract laboratory analytical results and QC data, if requested;
- Where applicable, report deficiencies in sample collection, preservation, handling, test methods, or documentation to the DEQ project manager and/or environmental contractor; and
- Initiate and support technical audits and corrective action that may arise from deficiencies in sample collection, preservation, handling, test methods, or documentation.

## **1.7. Background**

As part of DEQ's Cleanup Program, DEQ performs and oversees assessments and cleanup actions funded by EPA. With this Brownfield-specific QAPP in place, DEQ or contractor staff need prepare only a streamlined SAP that incorporates this QAPP by reference for Brownfield projects covered by this QAPP.

Approval of this Brownfield QAPP authorizes DEQ to conduct and oversee sampling activities at sites covered by DEQ's State Response grant with EPA, as well as by competitive brownfield grants EPA awards to DEQ and to other parties who opt to use DEQ's contractors for field work and/or lab analyses. This authority derives from EPA's approval of DEQ's Quality Management Plan (QMP).

This QAPP can be applied to any Brownfield project conducted in Oregon. (project managers must evaluate this QAPP and assess whether it meets the specific needs of the project.)

## **1.8. Project Task/Description**

The Brownfields site assessment requires a team approach encompassing a range of knowledge and skills. The Brownfields site assessment process routinely involves one or more of the following activities: review of historical records; coordination with local, state, federal and tribal staff; field investigation including sample collection and analysis; assessment of data useability; and evaluation of cleanup options and costs.

This QAPP defines the duties and responsibilities of staff at DEQ, environmental and laboratory contractors, and DEQ Laboratory staff involved in Brownfield projects. The objective of all QA activities is to ensure that data obtained from Brownfield projects are of known quality, represent actual site conditions, and are adequate and appropriate for making informed environmental decisions.

DEQ will use data obtained under this QAPP and site-specific SAPs to evaluate the nature, magnitude, and extent of contamination at Brownfield sites as well as to perform the remediation of documented contamination at Brownfield sites. The data will also help DEQ or others estimate costs of appropriate remedial actions for anticipated site-redevelopment scenarios. Sampling activities may be performed in

more than one event or multiple events, depending on sample results and funding limitations. In some cases, sampling may be performed in phases that span multiple cooperative agreement periods.

Media to be sampled most frequently under this QAPP include:

- Soil;
- Groundwater; and
- Soil gas.

Additional media that may be sampled infrequently under this QAPP can include but not limited to:

- Sludge;
- Sediment;
- Porewater;
- Surface water;
- Air; and
- Man-made materials (e.g. concrete and materials suspected of containing asbestos).

Categories of contaminants to be analyzed for typically include:

- Petroleum hydrocarbons ;
- Volatile and semi-volatile organic compounds;
- Pesticides and herbicides
- Polychlorinated biphenyls (PCBs);
- Dioxins/furans;
- Asbestos; and
- Metals.

## 1.9. Quality Objectives and Criteria

The purpose of this section is to provide qualitative and quantitative guidelines that should be used to define goals and DQOs of site-specific SAPs for Brownfield projects. Where time constraints or other resource limitations preclude development of site-specific SAPs, the guidelines defined in this QAPP should be followed.

The primary goal of sampling and analysis for Brownfield projects is to determine the nature and extent of site contamination from current or past uses of hazardous substances. Data collected from Brownfield projects will be used to outline suggested further investigative or remedial actions, to estimate costs to prepare the site for redevelopment, and to determine if any remedial actions that may have occurred are complete. Laboratory quantitation limits for Brownfield projects must be low enough to determine if analyte concentrations are above or below the agency's risk based concentrations (RBCs) for the intended future use of the site (See RBC table available on DEQ's Clean-up webpage).

Data for Brownfield projects must be of known quality. Field personnel and laboratories analyzing samples must record and retain sufficient notes and QC documentation to demonstrate and support the level of data quality required for these projects. Before initiating any Brownfield projects, contractors tasked for field work, analytical work (i.e., laboratories), and data-assessment activities should have a DEQ-approved Quality Management Plan (QMP) or Quality Systems Manual. The QMPs of contractors responsible for planning, field work, and data assessment should adequately describe their policies and procedures for ensuring data quality in their activities, including, but not limited to: 1) their organization's

QA policy; 2) a description of their Quality Management System structure; 3) Quality Management System activities; and 4) document/record-management procedures.

Laboratories analyzing samples must have a quality system that meets the requirements in the standards developed by The NELAC Institute (TNI) and adopted by the Environmental Laboratory Accreditation Program (NELAP) (<http://www.nelac-institute.org>).

Site-specific SAPs must describe field activities, including the following elements:

- A description of the project with relevant background information.
- A list of project members, their responsibilities, and contact information.
- A description of the sampling plan, including the location, number, and type (i.e., soil, water, air, etc.) of samples to be collected.
- Sampling procedures.
- Field documentation and procedures.
- Field equipment calibration and analyses.
- The number and type of QC samples to be collected and submitted for analysis (e.g., trip and rinsate blanks, duplicate samples, etc.). The collection rate for rinsate blanks and field duplicates may not be less than 5% (one blank and one duplicate for every 20 samples). Regardless of the number of samples collected, at least one rinsate blank and one field duplicate should be collected for each media sampled for each field event.
- The analytical methods and minimum detection limits and reporting limits that laboratories analyzing the samples must achieve.
- The analytical and field QC elements (e.g., blanks, replicates, fortified samples, etc.) and assessment criteria that the laboratories must meet, if these differ from those described in the laboratories' quality systems manual. The default laboratory QC requirements for analyses of samples from Brownfield projects are given in Table 1-2.
- Reporting requirements and formats for laboratory data (e.g., reporting units, electronic or printed formats, data flagging, etc.); all laboratory data must be accompanied by supporting QC data.
- Special safety, tribal concerns or other cautionary information.
- Any additional sampling, analytical, or QA/QC requirements that deviate from those established in this QAPP.

**Table 1-2 Field and Laboratory QC Elements and Sampling Criteria**

	QC Element	Frequency	Media <sup>#</sup>	Analyte Type <sup>*</sup>	Criteria
Field QC	Trip Blank	1 per cooler	All	Organic	Only required when collecting VOCs
	Rinsate Blank	5% for each media sampled (but at least one sample per field event)	All	All	< method reporting limit, or <10% of the lowest concentration identified in any sample
	Field Duplicate	5% for each media sampled (but at least one sample per field event)	Air, water	Inorganic	RPD +/- 20% for concentrations > 5X the QL, or Absolute difference ≤ QL for average concentrations ≤ QL
				Organic	RPD +/- 30% for concentrations > 5X the QL, or Absolute difference ≤ QL for average concentrations ≤ QL
			Solids, non-aqueous liquids	Inorganic	RPD +/- 30% for concentrations > 5X the QL, or Absolute difference ≤ QL for average concentrations ≤ QL
				Organic	RPD +/- 35% for concentrations > 5X the QL, or Absolute difference ≤ 2X QL for average concentrations ≤ QL
Laboratory QC	Method Blank	5% for each preparation	All	All	< 1/2 QL or <10% of the lowest concentration identified in any sample
	Laboratory Duplicates or Matrix Spike Duplicates	5% for each media sampled	Air, water	Inorganic	RPD +/- 20% for concentrations > 5X the QL, or Absolute difference ≤ QL for average concentrations ≤ QL
				Organic	RPD +/- 30% for concentrations > 5X the QL, or Absolute difference ≤ QL for average concentrations ≤ QL
			Solids, non-aqueous liquids	Inorganic	RPD +/- 30% for concentrations > 5X the QL, or Absolute difference ≤ QL for average concentrations ≤ QL
				Organic	RPD +/- 35% for concentrations > 5X the QL, or Absolute difference ≤ 2X QL for average concentrations ≤ QL
	Laboratory Fortified Sample (Matrix Spike)	5% for each preparation	Air, water	Inorganic	Recovery: 80-120%
				Organic	Recovery: 60-140%
			Solids, non-aqueous liquids	Inorganic	Recovery: 70-130% for at least 80% of the analytes
				Organic	Recovery: 50-120% for at least 80% of the analytes
	Surrogates	Each sample	All	Organic	Recovery: 50-150%
Laboratory Control Sample	1 per analytical batch	All	Inorganic	Recovery: 85-115%	
			Organic	Recovery: 70-130%**	

**Notes:**

<sup>#</sup> Water applies to all aqueous media containing less than 15% settleable solids, including drinking water, groundwater, surface water, waste effluent, etc. Solids applies to all aqueous media containing 15% or more settleable solids, including soils, sediments, and sludges. Non-aqueous liquids applies to any non-water substance containing less than 15% solids, including solvents, fuels, oils, etc. Air applies to all media in the gaseous state at ambient conditions at the time of sampling.

<sup>\*</sup> Inorganic analytes include all metals, nutrients, anions. Organic analytes include petroleum hydrocarbons, volatile and semi-volatile organic compounds, pesticides, herbicides, PCBs, and dioxins/furans. Not all analytes may be covered by this list. For additional information, contact the QA chemist at the DEQ laboratory.

<sup>\*\*</sup> May not apply to compounds that are known to be problematic. Consult with the DEQ Brownfields project manager if wider acceptance limits are needed.

## **1.10. Special Training Needs/Certification**

Field activities pose certain risks. Staff must obtain the proper training to recognize, and protect themselves from, hazardous chemicals known or suspected to be present at Brownfield sites. Staff with questions about risks they might be dealing with should use existing resources (e.g., Safety Data Sheets [SDS], literature, and laboratory staff) and contact the appropriate authority (e.g., DEQ's Health & Safety Manager, Laboratory Managers, or Safety Committee). DEQ's Safety Committee continually reviews health and safety needs. The Health & Safety Manager can recommend and supply the most appropriate personal protective equipment for work at specific sites, and is responsible for managing the respiratory protection program.

Safety training courses relevant to Brownfield projects are readily available. All DEQ field personnel and environmental contractors are required to have appropriate OSHA health and safety training for hazardous waste sites (EPA training is also acceptable), supplemented by annual refresher courses. Contractors are responsible for ensuring that their personnel are informed about and trained on relevant OSHA guidelines. For sites where DEQ staff performs field activities, a site-specific Health and Safety Plan (HASP) will be approved by DEQ's Health and Safety Manager and the appropriate Program Manager before field work begins. For sites where an environmental contractor performs field activities, the contractor will prepare and approve their own HASP.

## **1.11. Documentation and Records**

### **1.11.1 Introduction**

Documents and records produced during Brownfield projects must be properly managed. Documents and records typically produced may include, but are not limited to:

- Site-specific SAPs;
- State Historic Preservation Office, Endangered Species Act, and tribal correspondence;
- Site assessment, Analysis of Brownfield Cleanup Alternatives, and Remedial reports;
- Field notes and records;
- Chain-of-custody forms;
- Laboratory analytical reports;
- Field and laboratory QC data;
- Photographs; and
- Records of communication such as phone logs, memos, e-mails, or other written correspondence.

All documents associated with a specific project will be filed with the project manager and will be uniquely identified by the Site ID number in DEQ's ECSI or LUST databases. Project records will be maintained in both printed and electronic formats whenever practicable.

Printed records<sup>1</sup> serve as the official record and will be maintained in the site's ECSI or LUST file for a period of no less than 30 years after site closure or otherwise as according to the DEQ Record Retention Schedule. Electronic records, wherever possible, will be maintained in write-protected formats such as the Portable Document Format (.pdf). In maintaining and archiving these electronic records, project managers will follow any guidance and procedures that DEQ's Cleanup program has established for electronic records.

Each contractor must have its own record-keeping system to present, organize, and store data and maintain records for at least 10 years or as otherwise directed by contract. This system should be described in the contractor's QMP or Quality Systems Manual (however named). The described record-keeping system must permit the historical reconstruction of all activities that produced the resultant sample analytical data. The history of the sample must be readily understood through the documentation. This includes field and inter-laboratory transfers of samples and/or extracts. Each laboratory must document its record-handling policies in its Quality System Manual.

Samples submitted to laboratories from Brownfield project must be accompanied by a Chain of Custody form that identifies each sample, its location, date/time of collection, collector's name, preservation type, sample type, requested analytes, and any special remarks concerning the sample.

### 1.11.2 Required Project Documentation

Each contract laboratory must have a documented sample acceptance policy (usually in its Quality Systems Manual). This policy must describe the minimum data elements for samples submitted to the laboratory for analyses and conform to the requirements in the most recent TNI standard (currently 2009). The policy should state that the following conditions will be met for all samples received at the laboratory:

- proper, full, and complete documentation, including sample identification, the location, date and time of collection, collector's name, preservation type, sample type and any special remarks concerning the sample;
- proper sample labeling to include unique identification and a labeling system for the samples with requirements concerning the durability of the labels (water resistant) and the use of indelible ink;
- use of appropriate sample containers;
- adherence to specified holding times;
- sufficient sample volume to perform the necessary tests; and
- procedures to be used when samples show signs of damage, contamination or inadequate preservation.

Sample(s) failing to meet the above criteria may be analyzed, depending on the circumstances (with approval of the DEQ project manager), but the data will be clearly flagged when reported as having been compromised due to a deficiency in one or more of the elements listed above. Release of data from compromised samples will be deferred, awaiting the necessary documentation.

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<sup>1</sup> Printed records may be converted to electronic format and designated as the official record and maintained for 30 years or as according to the DEQ Record Retention Schedule. If this is done, all security protections must be in place to conform with agency records policies.

Documentation of any of missing information or instructions may be furnished to the laboratory *in writing* at any time up to the release of the data by the laboratory. When all sample acceptance criteria are met, the qualifying data flag will be expunged from the report provided the quality of the data has not been compromised.

- 1.) Complete sample documentation must be provided, including:
  - Unique sample identification;
  - Sample location;
  - Sample matrix (e.g., liquid, solid, sludge, sediment);
  - Sample classification (grab, continuous, composite);
  - Date and time of collection;
  - Sampler's name(s);
  - Analytes to be analyzed and, when appropriate, the specific analytical method; and
  - Special remarks describing the sample, if appropriate.
- 2.) The laboratory should be provided a copy of the site-specific SAP which should specify the following:
  - Number of samples by matrix, including QA (duplicates, matrix spikes & duplicates, blanks, etc.);
  - Name of the project manager;
  - Name of the person to whom the data are to be reported;
  - Analyses requested;
  - The detection limit needed [e.g., qualitative screen, DEQ Risk-Based Concentrations (RBCs), drinking water Maximum Contaminant Levels (MCLs), Toxicity Characteristic Leaching Procedure (TCLP), etc.]; and
  - Any specific QA/QC requirements.
- 3.) Third party laboratory analytical reports must include the following information for DEQ review (Note: When DEQ LEAP provides the analytical work, the same information is evaluated prior to reporting results):
  - A QA summary of the report, including a discussion of sample conditions upon arrival, as well as any QA/QC issues that may have arisen during analysis.
  - A complete result package that identifies analytical results, the units, and any qualifying data flags.
  - A complete QC package for each analyte-matrix combination that includes the batch QC data identified by the project's DQOs and DQIs.  
The report must definitively link the samples with their associated QC results.
  - Analytical reports will contain sufficient information to unambiguously link sample collection information to the group of analytical parameters.

### **1.11.3 Corrections to Documentation**

All original data recorded in field notebooks, chain-of-custody records, and other forms will be written in waterproof ink. None of these documents will be destroyed or thrown away, even if they are illegible or contain inaccuracies that require a replacement document. If an error is made on a document assigned to one individual, that individual will make corrections by crossing a single line through the error, entering the correct information, and initialing the correction.

Alterations or changes to SAPs, analytical reports, or any other formal written documentation will be accomplished by attaching an erratum or addendum to the *front* of the original document. All errata and addenda must be signed and dated. Changes to electronic records must mirror appropriate changes in printed records. Alternatively, a revised document may be created as long as the revision is clearly noted and supersedes the previous document. Both original and revised versions must be maintained in the project files.

## 2. Data Generation and Acquisition

### 2.1. Sampling Process Design

Brownfield projects primarily involve sampling of soil and groundwater. These projects may also require sampling of sediment, soil gas, porewater, sludge, hard surfaces that are potentially contaminated (e.g., concrete, construction material), or asbestos containing materials, surface water, and ambient air.

The purpose of sampling at Brownfield sites is to generate information that will inform marketplace decisions about the feasibility of redevelopment, consistent with protection of human health and the environment. ***Data from Brownfield projects are not designed to be used for enforcement purposes.***

Sampling plans for individual Brownfield sites should be designed to document site conditions related to the known or potential releases of hazardous substances. These plans should be developed based on the specific needs and phase of each Brownfield site. Typical plans may focus on providing a baseline assessment of site conditions, filling data gaps from past investigations, or documenting that remedial actions meet regulatory requirements.

Field sampling personnel will make arrangements with the appropriate laboratory for proper sample containers, sampling request forms, and sampling equipment at least two weeks before field work begins. All projects involving the collection and analysis of samples should be described in a site-specific SAP. All SAPs must be reviewed and approved by the DEQ project manager or his/her designee.

Sampling equipment should be assembled based on the type of samples to be collected. Preparation and assembly of required equipment and materials should follow these steps:

- 1) All equipment will be checked for proper calibration, assembly, and operation prior to use.
- 2) Sampling equipment will be transported in such a manner as to maintain its cleanliness.

To the greatest extent possible, disposable and/or dedicated personal protective and sampling equipment will be used to avoid cross-contamination. All non-disposable sampling equipment must be cleaned between sample locations. Decontamination will be conducted in a central location, upwind and away from suspected contaminant sources. Investigation-derived waste (IDW), such as soil from drill cuttings/auger spoils, purge water from groundwater sampling, or wastewater from decontamination of sampling equipment, if generated, will be stored in 55-gallon drums prior to disposal. A sample will be collected from the IDW and analyzed for disposal purposes.

The following decontamination procedures will be used for all non-disposable equipment used to collect routine samples undergoing trace organic or inorganic constituent analyses:

- 1) Clean with tap water and nonphosphate detergent using a brush if necessary to remove particulate matter and surface films. Equipment may be steam cleaned (using high-pressure hot water) as an alternative to brushing. Sampling equipment that is steam cleaned should be placed on racks or saw horses at least two feet above the floor of the decontamination pad. PVC or plastic items should not be steam cleaned.
- 2) Rinse thoroughly with tap water.

- 3) Rinse thoroughly with analyte-free water.
- 4) Rinse with a 10% nitric acid/deionized water mix, if the sample will be analyzed for trace inorganics. Do not rinse PVC or plastic items with acid.
- 5) Rinse thoroughly with analyte free water.
- 6) Rinse with a pesticide-grade acetone/deionized water mix if the sample will be analyzed for organics.
- 7) Rinse again with distilled/deionized water.
- 8) Air-dry the equipment completely.
- 9) Store the decontaminated equipment in a clean container.

### 2.1.1 Parameter-Specific Sampling Requirements

Parameter-specific sampling requirements, including container type, preservation requirements, and holding times, will be documented in a site-specific SAP whenever they depart from those defined in the DEQ Field Sampling Reference Guide (DEQ86-LAB-0002-QAG). Exceptions to standard sampling requirements may be made with written approval of the DEQ project manager.

The order of sample collection, regardless of the matrix, should be from the most volatile to the least volatile, and should be as follows:

- 1) VOCs;
- 2) Hydrocarbon Identifications (HCIDs) and Total Petroleum Hydrocarbons (NWTPH);
- 3) SVOCs (PAHs);
- 4) Chlorinated Phenolics;
- 5) Pesticides and PCBs; and
- 6) Total Recoverable Metals (RCRA 8 or TAL metals).

## 2.2. Sampling Methods

All samples must be collected in a manner consistent with the media being sampled and the analytes of interest. Collection methods must follow a DEQ or EPA-approved sampling protocol. Additional methods may be used with the approval of the project manager. Some sources for the appropriate sampling methods include:

- DEQ Water Monitoring and Assessment Mode of Operations Manual (MOM) DEQ03-LAB-0036-SOP (available at <http://www.deq.state.or.us/lab/techrpts/technicaldocs.htm>) – describes collection methods for surface waters, groundwaters, sediments, benthic infauna, fish, benthic macroinvertebrates, and aquatic invertebrates.

EPA SW-846, Chapter 10 – describes sampling techniques for various media, including soils, sediments, air, water, etc.

It is very important to use proper sample containers and appropriate preservation techniques when collecting samples. Samples should always be collected in containers supplied by the analyzing laboratory. This ensures that the container has been properly cleaned and that the analyzing laboratory will have sufficient sample material to conduct the requested test. Samples submitted to the laboratory that are not in a laboratory-supplied container are likely to be rejected. Samples must also be properly preserved, or they may be rejected. Table 2-1 summarizes required sample containers, preservation techniques, and holding times for the most commonly requested analytes in Brownfield projects. If sampling for VOCs in soil, additional guidance can be found in DEQ Program Policy: [Soil Sampling](#)

[Requirements for Volatile Organics in Land Quality Programs \(DEQ15-LQ-0053-QAG\)](#) and the follow-up [clarification memo](#).

For information about analytes not listed in Table 2-1, check with the analyzing laboratory.

Specific sampling methods for media of interest are discussed in greater detail in Sections 2.2.1 to 2.2.6.

**Table 2-1 Sample Containers, Preservation, and Holding Times ‡**

PARAMETER	CONTAINER <sup>(1)</sup>	PRESERVATIVE	HOLDING TIMES
<b>Volatile Organics (including NWTPH-GX)</b>			
Liquids	(2 or 3) x 40-ml vials with Teflon-lined septum caps	4 drops conc. HCL Cool, ≤ 6°C No headspace	14 days
	(2 or 3) x 40-ml vials with Teflon-lined septum caps	Cool, ≤ 6°C No headspace	7 days
Solids	2 x 40ml pre-tared VOA vials with Teflon-lined septum caps containing: low level: 10 ml DI water or empty, high level: 10 ml Methanol	Cool, ≤ 6°C / -7°C	48 hours /14 days
			14 days
Pure Product	One 40-ml vial with Teflon-lined septum caps	Cool, ≤ 6°C	14 days
Air	Summa Canister	None	30 days
	Tedlar Bags	None	3 days
<b>Semi-Volatile Organics</b>			
Liquids – NWTPH/HCID	1-quart brown/amber glass jar with Teflon liner	5 ml HCl, pH<2 Cool, ≤ 6°C	7 days extract analysis within 40 days of extraction
Liquids – PAHs/SVOCs	1-quart brown/amber glass jar with Teflon liner	Cool, ≤ 6°C	7 days extract analysis within 40 days of extraction
Solids	4-oz brown/amber glass jar with Teflon liner	Cool, ≤ 6°C	14 days extract analysis within 40 days of extraction
Air	Consult specific analytical method		
<b>PCBs, Chlorinated Pesticides, and Dioxins/Furans</b>			
Liquids	1-quart brown/amber glass jar with Teflon liner	Cool, ≤ 6°C	7 days extract analysis within 40 days of extraction – Pest. 1 yr. - PCB, Dioxins/Furans
Solids	4-oz brown/amber glass jar with Teflon liner	Cool, ≤ 6°C	14 days extract, analysis within 40 days of extraction – Pest 1 yr – PCB, Dioxins/Furans

PARAMETER	CONTAINER <sup>(1)</sup>	PRESERVATIVE	HOLDING TIMES
Air	Consult specific analytical method		
Organo-phosphorus Pesticides			
Liquids	1-quart brown/amber glass jar with Teflon liner	Adjust pH to 5-8 with NaOH or H <sub>2</sub> SO <sub>4</sub> Cool, ≤ 6°C	7 days extract analysis within 40 days of extraction
Solids	4-oz brown/amber glass jar with Teflon liner	Cool, ≤ 6°C	7 days extract analysis within 40 days of extraction
Air	Consult specific analytical method		
Metals (except Cr <sup>+6</sup> and Hg)			
Liquids	250-ml polyethylene	Total aqueous - unfiltered Dissolved aqueous - filter on-site HNO <sub>3</sub> , pH<2	6 months
Solids	Polyethylene or glass jar	None	6 months
Air	Consult specific analytical method		
Hexavalent Chromium (Cr <sup>+6</sup> )			
Liquids	250-ml polyethylene	Cool, ≤ 6°C	24 hours
Solids	Polyethylene, glass or zip-lock baggies	Cool, ≤ 6°C	1 mo. to extraction; 4 days after extraction
Air	Consult specific analytical method		
Mercury <sup>(2)</sup>			
Liquids	250-ml polyethylene	Total aqueous - unfiltered Dissolved aqueous - filter on-site HNO <sub>3</sub> , pH<2	28 days
Solids	Polyethylene or glass jar	Cool, ≤ 6°C	28 days
Air	Consult specific analytical method		
Asbestos			
Solids	Polyethylene or glass jar or plastic ziplock bag	NA	365 days
Air	Filter stored in plastic ziplock	NA	365 days

\*Always consult the specific analytical method for special sample collection, handling, and storage requirements. Cool < 6°C implies samples are held above freezing and below 6°C.

(1) Collect duplicate containers on at least 5% of the water samples for matrix spike/matrix spike duplicate analysis.

(2) Methyl mercury - consult with the analytical laboratory.

### 2.2.1 Sampling Soil

Use a stainless steel spoon to collect samples from surface soils. Subsurface soils can be collected during the advancement of soil boring, during excavation of contaminated media, during the removal of USTs, during the excavation of test pits using a variety of equipment including the use of direct push technology, hollow stem, air rotary, or sonic drilling technology, excavation equipment or hand auger. Samples should be collected according to procedures outlined in the EPA's guidance document *A Compendium of Superfund Field Operations Methods* (EPA/540/P-87/001).

All soil samples will be discrete samples, unless a site-specific plan has been developed to collect

composite or incremental samples for a specified purpose. Soil samples should contain as few cobbles or stones as possible, unless the project manager wishes them to be included in the analysis. Composite sampling is achieved by collecting several roughly equal sub-samples and thoroughly mixing to form one sample. Soil sample compositing is not recommended at sites where VOCs are the contaminants of concern.

Incremental sampling methodology may be considered and is becoming a more common way to assess some sites. Incremental sampling methodology is a structured composite sampling and processing protocol that reduces data variability and provides a reasonable estimate of a chemical's mean concentration for the area/volume of soil being sampled. Representativeness is established by collecting numerous increments of soil (typically 30 to 100 increments) that are combined, processed, and sub-sampled according to specific protocols. For detailed information on ISM, see the ITRC (Interstate Technology & Regulatory Council). 2012. Incremental Sampling Methodology. ISM-1 (<http://www.itrcweb.org/ism-1/>)

For samples collected for VOC analysis, a sample of the soil should be collected following EPA Method 5035A using an extrusion tool. This procedure involves field extraction of approximately 5 grams of sample placed in a pre-tared vial containing preservative and with a septum-sealed screw cap. Once sealed, the sample is not exposed to the atmosphere until analysis is conducted.

**Note:** Composite sampling, achieved by collecting several roughly equal sub-samples and thoroughly mixing in a jar to form one sample, is not acceptable for the analysis of volatile organics. Sampling for VOCs in soil is recommended to be completed by USEPA SW-846 Method 5035A, to prevent volatilization prior to analysis. Note that the ITRC incremental sampling (ISM) guidance discusses situations where ISM can be combined with Method 5035A if representative concentrations of VOCs are necessary for the project.

### **1) Hand Augers**

Hand augers can be used to collect soil samples to depths of approximately 10 feet. The sample is extruded into an aluminum or stainless steel pan followed by immediate placement into appropriate sample containers. Samples may be obtained from discrete depths by forcing the soil core from the auger and collecting soil from the depth of interest. The project manager for DEQ or for the environmental contractor should assess whether a lined or stainless steel auger is necessary.

### **2) Test Pits, Excavations, UST Removals**

Excavation activities include test pits, large excavations used to remove contaminated media, and the actions performed to remove an UST system (tanks and pipes). Excavation may occur by hand or more commonly with heavy equipment such as a backhoe or excavator. For excavations that may be safely entered by staff, samples are collected from the wall or floor of the excavated area after removing 1 inch of the exposed surface layer, and are placed directly into appropriate sample containers. For excavations that cannot be entered by staff, samples can be taken from an undisturbed volume of soil within a backhoe or excavator bucket.

### **3) Boreholes**

Subsurface soil samples can be collected from boreholes using a sampler specific to the drilling technology (liners, split-spoon sampler) and transferred to appropriate lab-supplied jars. During drilling, cuttings or sample materials are sealed in a plastic bag and screened using a photoionization detector (PID), or a flame ionization detector (FID) to guide where samples should be collected. All soil classifications will be performed using the ASTM D2487 Soil Classification Method.

## 2.2.2 Sampling Sediment

There are many factors to consider when choosing sediment sampling equipment, such as: sample site access, sample volume requirements, sediment texture, and target depth for sediment collection. In general, piston samplers are best used for soft, fine-grained sediments at depth. Grab/dredge samplers are best for coarse, shallow sediments and where large volumes of sediment are required. More information on sediment sampling is available at: [clu-in.org/download/contaminantfocus/sediments/methods-for-collection-epa-manual.pdf](http://clu-in.org/download/contaminantfocus/sediments/methods-for-collection-epa-manual.pdf) or [www.epa.gov/sites/production/files/2015-06/documents/Sediment-Sampling.pdf](http://www.epa.gov/sites/production/files/2015-06/documents/Sediment-Sampling.pdf)

## 2.2.3 Sampling Sludge

Sampling of sludge could involve a variety of situations and sampling equipment will be site-specific. One of the more common sludge-sampling situations is for catch-basin materials. Equipment might include stainless steel trowels or spoons, hand augers, or dredges.

## 2.2.4 Sampling Water

Surface water samples are typically acquired from streams, brooks, drainage ways, and wetlands determined to be downgradient (or downstream) from contamination sources. Groundwater samples are typically collected from wells screened within the uppermost aquifer, but may also be collected from deeper aquifers, and from nearby residential, industrial, irrigation, or municipal/community wells, or from excavations.

Surface water and/or groundwater sampling events that are performed on a project-specific frequency require an approved site-specific SAP.

General procedures of the most common types of water sampling are described below. Additional sampling procedures may be found in the DEQ Water Quality Monitoring (WQM) section's *Mode of Operation Manual* (DEQ03-LAB-0036-SOP), which includes procedures for sampling rivers, streams, estuaries, lakes, groundwater wells, soil, shellfish, fish, and sediment.

### 1) Surface Water

Surface water samples are best collected using a stainless steel bucket. Before collecting a sample, the container should be rinsed out with water from the area to be sampled. Then collect a fresh sample. Avoid dipping sample bottles into the collection container, since residue from the outside surface of the bottle, or your hands, could contaminate samples and/or expose you to hazardous materials. Instead, pour from the collection container, with minimal agitation, into the sample bottle. If a stainless sampling container is not available, dip the sample bottle directly into the water, install a lid, and wipe off the outside of the container with a paper towel.

### 2) Groundwater (excluding Water-Supply Wells)

Monitoring wells may be sampled using dedicated pumps, disposable bailers, peristaltic pumps with new tubing, bladder pumps, foot-valve inertia pumps with polyethylene tubing, or 2-inch submersible pumps. DEQ staff performing the sampling may request disposable bailers or tubing from the Sample Tracker at DEQ's laboratory.

If collecting split samples, ensure they are homogeneous by filling a large clean container and gently swirling the contents before pouring into appropriate bottles. For VOC analytes, the sample containers will be filled directly from the sample source in the following manner: one from the primary sample bottle set, then one from the split-sample bottle set, and so forth. Samples used to measure field parameters (temperature, pH, DO, etc.), or samples collected in purge vials for VOC analyses, cannot be

split in this manner. They must be filled individually, directly from the tap or bailer. All samples from a given site should be representative of the water source from which they're collected.

All monitoring wells must be properly installed and developed in accordance with Oregon Water Resources Department (WRD) rules and regulations. Nonstandard wells or problems encountered during sampling should be noted in the field log and in subsequent reports.

Groundwater samples from soil borings may be collected by: 1) grab samples; or 2) temporary well points using a stainless steel or PVC screen. Groundwater samples can be obtained by using a small bladder pump, peristaltic pump, small stainless steel or Teflon bailers, or polyethylene or Teflon tubing and foot valve. All soil borings advanced must meet WRD rules and regulations regarding geotechnical holes.

### **3) Water-Supply Wells, including Drinking-Water Wells**

Use the following procedures when sampling a water-supply well:

- Obtain permission to access property and obtain samples for analysis.
- Inspect the water system to locate the tap nearest the wellhead. Samples should be collected prior to any treatment units (UV units, reverse osmosis, *etc.*) if possible.

Before collecting samples from drinking water, irrigation, or industrial wells, purge the water lines for a few minutes to flush the plumbing and holding tanks -- so that the sample collected is as representative as possible. Remove any faucet aerators, and reduce water flow prior to collecting samples. Then fill the sample container directly from the tap (unless the sample is to be split, in which case the sample should be homogenized before distributing into the duplicate split containers). Collect all samples intended for VOC analyses according to SOPs in DEQ's Field Sampling Reference Guide (DEQ86-LAB-0002-QAG).

#### **2.2.5 Sampling Porewater**

Porewater is water within the upper few centimeters of sediments below surface water bodies. This zone is known as the *hyporheic zone*, and represents the groundwater/surface water interface. Sampling of this zone can be done with various equipment such as diffusion samplers, syringe and push-point porewater samplers. More information is available at: <https://clu-in.org/programs/21m2/sediment/>. Discharge of groundwater to surface water through the hyporheic zone is unlikely to be homogeneous; therefore, determining locations for sampling can involve additional investigative steps.

#### **2.2.5 Sampling Air**

Air sampling can consist of sampling indoor and outdoor ambient air, sub-slab air, crawlspace air, and soil gas. Ambient air sampling should always be approached with caution as the source of contamination is often not readily apparent, such as at operating dry cleaners or auto fueling/servicing facilities.

Air sampling equipment depends on sampling objectives, the nature of the site itself, the contaminants of concern, and analytical methods. Typical sampling containers include tedlar bags<sup>1</sup>, stainless steel SUMA canisters, and glass sorbent traps used with sampling pumps. Indoor, outdoor, and crawlspace air is collected directly into sampling containers. Soil gas samples and sub-slab vapor samples are collected into sampling containers from subsurface soil gas sampling probes which may be permanent or temporary

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<sup>1</sup> Verify that tedlar bags are appropriate for the specific analytes and data quality objectives.

installations. More information on air sampling and analysis to evaluate vapor intrusion from contaminated soil or groundwater is available in DEQ's [Guidance for Assessing and Remediating Vapor Intrusion in Buildings](#).

## 2.3. Sample Handling and Custody

Custody procedures differ among laboratories. Custody procedures of the analyzing laboratory will be identified prior to field activities, including the DEQ laboratory.

Sample integrity must be maintained throughout the collection, transport, storage, and analysis process. Consequently all field activities must be fully documented, the samples must be clearly identified, and custody procedures followed in both field and laboratory operations.

The primary objective of chain-of-custody procedures is to provide an accurate written or computerized record that can be used to trace the possession and handling of a sample from collection through completion of all required laboratory analyses. A sample is considered in custody when it is:

- In someone's physical possession;
- In someone's view; or
- Locked up or kept in a secured area that is restricted to authorized personnel.

All changes in sample possession must be fully and completely documented, with the date, time, and persons relinquishing and receiving the samples on the appropriate chain-of-custody record.

### 2.3.1 Field Documentation

The following types of field documentation should be maintained as part of the sample handling and custody record. Additional types of documentation may be relevant and should be identified in the site-specific SAP.

- Field notes or logbooks
- Site observations and photographs (with written descriptions)
- Names, titles, organization, and roles of sample collectors
- Date/time of sample collection
- Sample number
- Location of sampling station (include latitude/longitude)
- Number and type of samples shipped
- Number of shipping containers sent
- Equipment numbers and/or calibration information
- Sample collection forms
- Chain of custody / Analytical request form

### 2.3.2 Field Custody Procedures

To ensure proper custody while in the field, the following custody procedures will be followed:

- Sample bottles from containers that appear to have been compromised shall not be used;
- The sample collector will assume responsibility for the samples until transferred to another person following the appropriate chain-of-custody procedures;
- All sample data will be recorded in ink in a field notebook and on the appropriate field forms;
- A site team leader will assess if additional samples are required;

- All samples requiring thermal preservation must be shipped with an appropriate temperature blank (in each cooler), which will (at a minimum) consist of a 100-mL polyethylene bottle filled with clean water; alternatively, a random sample container will be used as the temperature blank.
- Each cooler (shipping container) in which samples are packed will be sealed and accompanied by one copy of the chain-of-custody record that is sealed in a zip-lock bag and taped to the inside lid of the shipping container;
- A separate chain-of-custody record will accompany each shipment of samples;
- Packaging, marking, labeling, and shipping of samples will comply with all regulations promulgated by the U.S. Dept. of Transportation, 49 CFR 171-177, and International Air Transport Association; and
- Freight bills and bills of lading will be maintained as part of the permanent project record.

### 2.3.3 Laboratory Custody Procedures

Transfer of the samples into laboratory custody will follow standard custody procedures and be fully documented on a Chain-of-Custody form. (The DEQ lab uses DEQ06-LAB-0054-FORM, available on Q-Net). The sample receiver shall note the condition of the shipping containers and the custody seals (i.e., broken, unbroken). The laboratory individual responsible for sample intake shall document the condition of individual samples in the shipping container as well as the temperature of the container upon receipt (recording the temperature of the temperature blank or if no temperature blank is present, recording the temperature of one of the samples in the cooler). If the shipping container, any individual sample containers, or the shipping temperature is out of control, the laboratory should contact their client for instructions on how to proceed with sample processing. The laboratory should follow the procedures documented in its Quality Manual for chain-of-custody sample handling.

### 2.3.4 Sub-sampling

Occasionally heterogeneous samples must be split into new containers after receipt at the laboratory. The laboratory or contractor should have documented procedures for taking sub-samples (or it may be described in the SAP). Project samples containing mixed media should not be split into different containers without first homogenizing the sample unless otherwise stated in the SAP. If it is determined during data review that the sample was mishandled the analytical results will be flagged.

## 2.4. Analytical Methods

All analytical methods used on samples from Brownfield projects must comply with relevant requirements of applicable federal or state programs for which they were collected (e.g., Comprehensive Environmental Response, Compensation, and Liability Act - CERCLA Clean Water Act - CWA, Safe Drinking Water Act - SDWA, Resource Conservation and Recovery Act - RCRA, Clean Air Act - CAA, etc.), or EPA-approved alternate methods. The current approved list of methods under the CWA and SDWA are promulgated in the *Code of Federal Regulations* (40 CFR Part 136, 40 CFR part 141) can be found at <http://www.ecfr.gov/cgi-bin/ECFR?page=browse>. The CFR is reviewed and updated annually by EPA as needed.

Current, approved methods under RCRA SW-846 can be obtained from the EPA website at <https://www.epa.gov/hw-sw846/sw-846-compendium>. Since the lists of approved analytical methods is subject to routine updates, contact the project manager or DEQ laboratory for a list of currently approved methods. SW-846 method updates occur on a periodic basis and there are no implementation dates assigned; it is satisfactory for a lab to be behind one version (e.g. 8270 D is the current version, it would be acceptable if labs were still referencing 8270C, though when the version is updated to 8270E, the labs

should be at least at 8270D). Table 2-2 below lists the classes of analytes that are typically of the greatest interest during Brownfield projects, as well as DEQ's preferred analytical methods. This table provides a starting point for selecting analytical methods for Brownfield projects. Additional methods may be available and appropriate; consult with the project manager for approval of alternate methods.

All results for analytical testing on soil and solid matrix samples for Organic and Inorganic analyses must be reported on a dry weight basis and identified as such in the final report, using the calculation below.

$$\text{Wet weight result} / \% \text{ solids} = \text{Dry weight result} \quad [\text{Equation 2-1}]$$

**Table 2-2 Preparation and Analytical Methods for Common Analytes of Interest**

Analytes of Interest	DEQ Preferred Method
<b>Inorganics - general</b>	<p><b>Preparation Methods:</b>            1311 Rev 0 (7/92) - Toxicity Characteristic Leaching Procedure            3010A Rev 1 (7/92) - Acid Digestion of Aqueous Samples and Extracts for Total Metals for Analysis by FLAA or ICP Spectroscopy            3020A Rev 1 (7/92) - Acid Digestion of Aqueous Samples and Extracts for Total Metals for Analysis by GFAA Spectroscopy            3031 Rev 0 (12/96) - Acid Digestion of Oils for Metals Analysis by Atomic Absorption or ICP Spectrometry            3050B Rev 2 (12/96) - Acid Digestion of Sediments, Sludges, and Soils            3051A Rev 1 (2/07) - Microwave Assisted Acid Digestion of Sediments, Sludges, Soils, and Oils</p>
<b>Metals</b>	<p><b>Analytical Methods:</b>            6010D Rev 3 (7/2014) - Inductively Coupled Plasma-Atomic Emission Spectrometry            6020B Rev 1 (7/2014) - Inductively Coupled Plasma - Mass Spectrometry            7061A Rev 1 (7/92) - Arsenic (Atomic Absorption, Gaseous Hydride)            7062 Rev 0 (9/94) - Antimony and Arsenic (Atomic Absorption, Borohydride Reduction)            7741A Rev 1 (9/94) - Selenium (Atomic Absorption, Gaseous Hydride)            7742 Rev 0 (9/94) - Selenium (Atomic Absorption, Borohydride Reduction)            7470A Rev 1 (9/94) - Mercury in Liquid Waste (Manual Cold-Vapor Technique)            7471B Rev 2 (2/2007) - Mercury in Solid or Semisolid Waste (Manual Cold-Vapor Technique)            7472 Rev 0 (12/96) - Mercury in Aqueous Samples and Extracts by Anodic Stripping Voltammetry (ASV)            7473 Rev 0 (2/2007) - Mercury in Solids and Solutions by Thermal Decomposition, Amalgamation, and Atomic Absorption Spectrophotometry.            7474 Rev 0 (2/2007) – Mercury in Sediment and Tissue Samples by Atomic Fluorescence Spectrometry.</p>
<b>Mercury speciation</b> (elemental vs. organic/methylmercury)	Contact the DEQ project manager and DEQ laboratory
<b>Hexavalent Chromium (Cr+6)</b>	<p><b>Preparation Methods:</b>            3060A Rev 1 (12/1996) - Alkaline Digestion for Hexavalent Chromium</p> <p><b>Analytical Methods:</b>            7199 Rev 0 (12/1996) - Chromium Hexavalent , Ion Chromatography</p>
<b>Cyanide</b>	<p><b>Preparation Methods:</b>            9010C Rev 3 (11/2004) - Total and Amenable Cyanide: Distillation            9013A Rev 1 (07/2014) - Cyanide Extraction Procedure for Solids and Oils            9013A Rev 1 (07/2014) - Cyanide Extraction Procedure for Solids and Oils</p> <p><b>Analytical Methods:</b>            9012B Rev 2 (11/2004) - Total and Amenable Cyanide (Automated Colorimetric, with Offline Distillation)            9014 Rev 0 (12/96) - Titrimetric and Manual Spectrophotometric Determinative Methods for Cyanide            9213 Rev 0 (12/96) - Potentiometric Determination of Cyanide in Aqueous Samples and Distillates with Ion-Selective Electrode</p>
<b>Sulfides</b>	<p>9030B Rev 2 (12/96) Acid-Soluble and Acid-Insoluble Sulfides: Distillation            9034 Rev 0 (12/96) Titrimetric procedure for Acid-Soluble and Acid-Insoluble Sulfides            9215 Rev 0 (12/96) Potentiometric Determination of Sulfide in Aqueous Samples and Distillates with Ion-Selective Electrode</p>

Analytes of Interest	DEQ Preferred Method
Organics - general	<p><b>Preparation Methods:</b>            3500C Rev 3 (2/2007) - Organic Extraction and Sample Preparation            3510C Rev 3 (12/96) - Separatory Funnel Liquid-Liquid Extraction            3511 Rev 1 (07/2014) - Organic Compounds in Water by Microextraction            3520C Rev 3 (12/96) - Continuous Liquid-Liquid Extraction            3535A Rev 1 (2/2007) - Solid-Phase Extraction (SPE)            3540C Rev 3 (12/96) - Soxhlet Extraction            3541 Rev 0 (9/94) - Automated Soxhlet Extraction            3542A Rev 1 (05/2005) or 3542A Rev 1 (5/2005) - Extraction of Semivolatile Analytes Collected Using Method 0010 (Modified Method 5 Sampling Train)            3545A Rev 1 (2/2007) - Pressurized Fluid Extraction (PFE)            3550C Rev 3 (2/2007) - Ultrasonic Extraction            3560 Rev 0 (12/96) - Supercritical Fluid Extraction of Total Recoverable Petroleum Hydrocarbons            3561 Rev 0 (12/96) - Supercritical Fluid Extraction of Polynuclear Aromatic Hydrocarbons            3562 Rev 0 (2/2007) Supercritical Fluid Extraction of Polychlorinated biphenyls (PCBs) and Organochlorine Pesticides.            3580A Rev 1 (7/92) - Waste Dilution            3585 Rev 0 (12/96) - Waste Dilution for Volatile Organics</p> <p><b>Analytical</b>            8000D (07/14) Determinative Chromatographic Separations</p>
Volatile organics, including BTEX and MTBE	<p><b>Analytical Methods:</b>            8260B Rev 2 (12/96) or -8260C Rev 3 (8/2006) Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)</p> <p>8021B Rev 3 (07/2014) - Aromatic and Halogenated Volatiles by Gas Chromatography Using Photoionization and/or Electrolytic Conductivity Detectors</p>
Stoddard solvent or Mineral Spirits	<p><b>Analytical Methods:</b>            8015C Rev 3 (02/2007) - Nonhalogenated Organics by Gas Chromatography GC/FID</p> <p>8260B Rev 2 (12/96) or -8260C Rev 3 (8/2006) Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)</p>
Fuels	<p><b>Preparation and analytical methods</b>            NWTPH – HCID - Hydrocarbon Identification Method for Soil and Water            NWTPH – GX - Volatile Petroleum Products Method for Soil and Water Analyses            NWTPH – DX - Semivolatile Petroleum Products Method for Soil and Water Analyses</p>
Semivolatile organics	<p><b>Analytical Methods:</b>            8270D Rev 5 (7/2014) - Semivolatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS)            8275A Rev 1 (12/96) - Semivolatile Organic Compounds (PAHs and PCBs) in Soils/Sludges and Solid Wastes Using Thermal Extraction/Gas Chromatography/Mass Spectrometry (TE/GC/MS)</p>
Chlorinated phenols	<p><b>Analytical Methods:</b>            8041A Rev 1 (2/2007) - Phenols by Gas Chromatography</p>

Analytes of Interest	DEQ Preferred Method
<b>Dioxins/furans</b>	<b>Analytical Methods:</b> 8280B Rev 2 (2/2007) - The Analysis of Polychlorinated Dibenzo- <i>p</i> -Dioxins and Polychlorinated Dibenzofurans by High Resolution Gas Chromatography/Low Resolution Mass Spectrometry (HRGC/LRMS) 8290A Rev 1 (2/2007) - Polychlorinated Dibenzodioxins (PCDDs) and Polychlorinated Dibenzofurans (PCDFs) by High-Resolution Gas Chromatography/-High-Resolution Mass Spectrometry (HRGC/HRMS) 1613B Rev 2 (10/94) - Tetra- through Octa-Chlorinated Dioxins and Furans by Isotope Dilution HRGC/HRMS
<b>PCBs/Aroclors and PCB/congeners</b>	<b>Analytical Methods:</b> 8082A Rev 1 (2/2007) - Polychlorinated Biphenyls (PCBs) by Gas Chromatography 1668B Rev 2 (11/2008) Chlorinated Biphenyl Congeners in Water, Soil, Sediment, Biosolids, and Tissue by HRGC/HRMS
<b>Pesticides &amp; herbicides (chlorinated and organophosphorus)</b>	<b>Analytical Methods:</b> 8081B Rev 2 (2/2007) - Organochlorine Pesticides by Gas Chromatography 8141B Rev 2 (2/2007) - Organophosphorus Compounds by Gas Chromatography: Capillary Column Technique 8151A Rev 1 (12/96) - Chlorinated Herbicides by GC Using Methylation or Pentafluorobenzoylation Derivatization 8270D Rev 4 (2/2007) - Semivolatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS). 1699 Rev 0 (12/2007) Pesticides in Water, Soil, Sediment, Biosolids, and Tissue by HRGC/HRMS.
<b>Asbestos</b>	<b>Analytical Methods:</b> EPA1600/R-93/116 (07/1993)- Method for the Determination of Asbestos in Bulk Building Materials (used for solid matrices)  NIOSH 7200 – (Issue 2, 08/1994) Asbestos and other Fibers by Phase Contract Microscopy (used for air particulates)

The *DEQ Field Sampling Reference Guide (FSRG)* (DEQ86-LAB-0002-QAG) documents the analytical methods currently used by DEQ's laboratory.

## 2.5. Quality Control

DEQ recognizes that regulatory actions and environmental decision-making requires data and information of the highest possible quality. Consequently, DEQ has implemented an Agency-wide Quality Management System, which is documented in the DEQ Quality Management Plan. (DEQ03-LAB-0006-QMP). Every procedural aspect, from project planning, sample collection, laboratory analysis, to data assessment, imparts a significant and often critical bearing on environmental decisions.

### 2.5.1 Project Planning

DEQ employs a team-based project planning approach that draws together diverse interests and participants to define the scope and framework of a project before actual work begins. This QAPP describes and defines the general quality objectives of the Brownfield program. Site-specific quality objectives are often further defined by individual project managers in SAPs. This "graded" approach to quality system management ensures that quality activities are conducted throughout the project, but allows for the flexibility to tailor quality-related activities to individual projects.

## 2.5.2 Field QC Requirements

### 1) Training Field Personnel

DEQ has a training program for DEQ personnel that addresses acceptable sampling techniques, sample collection, preservation and handling procedures, and field instrument operation and documentation procedures. This is coordinated through DEQ's Quality Assurance Officer and the Watershed Assessment Section at DEQ's laboratory.

### 2) Field QC Samples

Field transport (trip) blanks will be submitted for each Brownfield project that involves sampling for VOCs. These blanks are prepared by the analyzing laboratory using distilled, de-ionized water, shipped with the other sample bottles to the field, and then returned to the analyzing laboratory with the samples for analysis. Field transport blanks are not separated from other samples, but are packaged with the environmental samples collected during the sampling event.

These other field blanks may be used, depending on site-specific circumstances and project DQO needs:

Transfer blanks consist of sample containers filled at the site with purified water, and are used to assess the potential for airborne contamination at a site. Transfer blanks are most beneficial when sampling for VOCs or if there are significant particulates in the air (blowing dust) and sampling is for metals.

Rinsate (equipment) blanks are generated by pouring purified water over decontaminated equipment and collecting the rinsate. They are used to assess potential contamination of samples resulting from improperly decontaminated sampling equipment. Rinsate blanks are strongly recommended for most Brownfield projects.

Field duplicates will be collected at a rate of one per 20 samples in each media, with a minimum of one duplicate within each media per sampling event. Field duplicates are taken within five minutes of collecting the original samples, and include all sub-samples. These samples are shipped back with the other sample bottles for analysis. The use of matrix spikes and matrix spike/duplicates are described in the *DEQ Field Sampling Reference Guide* (DEQ86-LAB-0002-QAG).

## 2.5.3 Laboratory QC Requirements

Routine laboratory QA activities are documented in the analyzing laboratory's *Quality Manual* (however named). Laboratory quality manuals must adhere to consensus standards adopted by the National Environmental Laboratory Accreditation Program (NELAP), which include at a minimum the following elements:

Routine quality control procedures must be outlined in the analyzing laboratory's *Quality Manual* and are used for all samples that are submitted for this project. Routine procedures must follow the most recent standards adopted under the National Environmental Laboratory Accreditation Program (NELAP), which include:

- 1) Daily instrument calibration or calibration verification prior to analysis of any samples.
- 2) Calibrations must be verified according to the analytical methods using a standard source other than the source used for the instrument calibration.
- 3) Method blank analysis daily or at a frequency of 1/20 samples, whichever is greater.
- 4) Analysis of a Laboratory Control Sample (LCS) or a certified reference material (CRM) at a frequency of 1/ per batch of 20 or fewer samples. This sample is sometimes referred to a blank spike.

- 5) Analysis of a matrix spike at a frequency of 1/20 samples, or as the matrix changes, to assess accuracy and identify possible matrix interferences.
- 6) Analysis of laboratory sample duplicates or matrix spike/matrix spike duplicates (MS/MSD) on a frequency of 1/20 samples to assess the precision of the analysis.
- 7) Determination of the minimum reporting limit based on detection limit studies and the concentration of the lowest calibration standards.

The expectations for analytical precision and accuracy fall within the overall expectations for precision and accuracy as described in Table 1-2 or in a site-specific SAP approved by DEQ. Precision and accuracy will vary with the analytical method and laboratory procedures. The laboratory must qualify any results that do not meet the acceptance criteria on the analytical reports. The analyzing laboratory must make precision and accuracy statements available upon request.

Most projects will only require the information necessary for a Stage 2A validation as defined in EPA-540-R-08-005 (*Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use*) to be submitted. This means the analyzing laboratory must include, in addition to sample results, sample receipt conditions and sample-related QC results (method blanks, LCS, matrix spikes and laboratory duplicate). If additional validation is required for a specific project, it should be defined in a QA plan or sampling and analysis plan.

#### **2.5.4 Data Assessment**

Data processing, verification, and validation are the quality management tools used to determine if project data meet the planned DQOs and requirements defined in this QAPP and in site-specific SAPs. During data assessment and validation, project data should be evaluated for completeness, correctness, and compliance against the method, procedural, or contractual requirements of the project. In the event that the analytical data is compromised in some way, data qualifying flags must be used to explain the variance. If unsure, the DEQ project manager will ask DEQ LEAP staff to assist in the analytical data assessment.

Laboratories must qualify all results that are affected by QC exceptions, as noted above, or other events that affect the interpretation of the analytical results. Laboratories all use different qualifiers so the lab must unambiguously define each flag they use in the analytical report.

The following data qualifying flags are standard USEPA validation flags that can be used by analytical laboratories and contractors providing services for Brownfield projects. The "Q" flag should be used to identify QC issues that may be relevant to interpretation of the analytical data and are not identified using one of the other flags. All "Q" flags must have explanatory statements.

- **J** - the result is an estimate because the measured sample concentration is less than the laboratory's method reporting limit (QL) but greater than the method detection limit (MDL), or laboratory QC criteria were not satisfied.
- **J+** - the result is an estimate (see "J"), and may be biased high.
- **J-** - the result is an estimate (see "J"), and may be biased low.
- **B** - the blank was contaminated with the analyte being reported.
- **U** - the measured sample concentration is less than the laboratory's reported quantitation limit (QL).
- **N** - the analysis indicates the presence of an analyte for which there is sufficient evidence to make a "tentative identification."

- **R** - the data are unusable due to serious QC failures. The presence or absence of an analyte cannot be verified. Resampling and/or reanalysis is required for verification.
- **UJ** - the analyte was analyzed for but not detected at the reported quantitation limit. Result is also estimated because of QC failures.
- **NJ** - the analysis has indicated the presence of an analyte that has been "tentatively identified" and the associated value represents its approximate concentration.
- **Q** - not all quality control criteria were satisfied.

Data validation and assessment are done by evaluating data against six Quality Assurance elements:

- Sensitivity
- Precision;
- Accuracy;
- Representativeness;
- Comparability; and
- Completeness

Verified data can then be validated against performance measures and DQOs established in this QAPP and in site-specific SAPs. The generic data assessment criteria for project data is discussed and defined below in items 1 – 6.

### **1) Sensitivity**

Brownfield projects require analytical data sufficient to satisfy the DQOs which depend on the intended site use. The QLs developed for a SAP should be 5-10x below any action level where possible. It should be noted that there are some RBCs where this is not possible. For the very low RBCs it may be necessary to report data below the laboratory's QLs for those parameters (report to their MDL). Values less than the laboratory's QL must be reported as an estimate.

Blanks should be less than ½ the QL for each analyte listed in the SAP. Laboratory Method Blanks (MB) will be prepared along with each LCS. The MB will be used to assess the sensitivity of the method. If corrective action measures fail to resolve MB errors, results batched with the MB will be flagged with the appropriate data qualifier.

### **2) Precision**

Precision is a measure of the scatter of the data when more than one measurement is made on the same sample. Scatter is commonly attributed to sampling activities and/or chemical analysis. Duplicate samples are collected in the field to assess precision attributable to sampling activities. Replicate analyses are performed with each test to assess data variability in laboratory analysis. Precision will be expressed as relative percent difference (RPD). Project managers should indicate their preference as to what sample should be duplicated.

Site-specific SAPs may request tighter control limits for the initiation of corrective action. For concentrations well above the reporting limit, 20% RPD is acceptable. If concentrations are low, precision will be assessed by evaluating the actual difference between the values. The analyzing laboratory must determine its own control limit. Until the analyzing laboratory has collected sufficient data, it is acceptable to arbitrarily set the control limit to that presented in the cited method. When requested, the DEQ QA section will review agency sampling events with duplicate samples and prepare a QA report. The DEQ laboratory routinely splits a sample to perform replicate analyses. Site-specific SAPs may specify the frequency of sample splitting, and indicate which samples are to be replicated. Also see Table 1-2.

### **3) Accuracy**

Accuracy is a measure of the difference between observed test results and true sample concentrations. Inasmuch as true concentrations are not known, accuracy is inferred from recovery data determined from standard reference materials (SRM) or laboratory control samples (LCS) and from matrix spikes.

SRM and/or LCS are used to assess laboratory performance using a particular method. The SRM is a sample of known composition in a relatively clean matrix similar that being tested and LCS are known concentrations of a standard spiked into a clean matrix (reagent water, or Ottawa sand, or clean air, etc). Accuracy is expressed as percent recovery of the known concentration. Some methods specify control limits. For those methods that do not, the analyzing laboratory should determine its own control limits however it is expected they should generally be within the limits expressed in Table 1-2.

Matrix spike/matrix spike duplicates (MS/MSD) are used to evaluate the performance of the analytical method on the specific sample matrix (not an evaluation of laboratory control). Laboratories spike one sample from each preparation batch however, unless specified, samples that are collected for this particular project may not be spiked. Because of this, a site-specific SAP should require a sample from the project to be spiked. Some organic methods require surrogate spikes on each sample, from which accuracy is assessed. The analyzing laboratory must determine its own control limit; limits should be similar to those listed in Table 1-2. Until the analyzing laboratory has collected sufficient data, it is acceptable to set the control limit to that presented in the cited method or in Table 1-2.

### **4) Representativeness**

Representativeness is a measure of how closely observed test results for a given sample matrix reflect actual site conditions. Sampling design and sampling procedures must be developed so that results represent the matrix being measured. Sample handling protocols for storage, preservation, and transportation have been developed to preserve the representativeness of collected samples. Proper documentation will establish that protocols have been followed and sample identification and integrity assured. Trip blanks, rinsate blanks, and field duplicates will be used to assess field and transport contamination and method variation. Laboratory method blanks will be run on a daily basis. If it is determined that sample integrity has been compromised, data will be flagged with the appropriate data qualifier.

Samples not representative of the population often occur in judgmental sampling because not all the sample locations are equal. The rationale for selecting sampling locations should be described in the SAP.

Since special or unusual sample conditions might affect the accuracy of an analysis, it is helpful to have information about the sample matrix. Results of such matrix tests may give additional insight into the representativeness of the analyses. Tests describing the sample matrix may be requested on a site-specific basis. When appropriate, other QA tools such as ion balance reports, solid balances, conductivity-dissolved solid comparisons, etc., will be used to establish the representativeness of the data.

Quality analytical measurements with poor field duplicate precision may point to sampling problems or heterogeneous samples that are not necessarily representative of site conditions. To ensure the representative data quality indicator is correct, field duplicates must be collected. Evaluation of field duplicate, lab duplicate, and accuracy data will provide information if there is error in the hypothesis that the sample is homogeneous. If field duplicate data exceeds precision limits but lab duplicate and accuracy data is acceptable, the sampling design may be in error and the data may not represent the environmental conditions for which it was collected. If field duplicate data indicates Representativeness is acceptable, data users may assume other project data meet Representativeness objectives.

If data obtained from a sample location is not indicative of the normal ambient conditions and the variances are attributable to anomalous environmental conditions, the data from that sample location will be qualified and assigned a DQL of "F".

## 5) Comparability

The objective of this parameter is to assure that data developed during the investigation are either directly comparable, or comparable with defined limitations, to literature data or other applicable criteria. Comparability of the data will be maintained by using EPA-approved procedures. The analyzing laboratory must list analytical methods used in its Quality Systems Manual. If a site-specific SAP requires a new method, it should indicate how the method compares to other methods. The analyzing laboratory must measure comparability of test methods not cited in EPA or agency documentation by evaluating inter-laboratory splits and/or alternate test procedures.

## 6) Completeness

Completeness measures the amount of valid data obtained from the analytical measurement system compared to the amount expected to be obtained. Completeness is defined as the total number of samples taken for which valid analytical data are obtained, divided by the total number of samples collected, multiplied by 100. For Brownfield projects, at least 90% of all samples tested (for each analyte) should yield valid data<sup>1</sup>.

## 2.6. Instrument/Equipment Testing, Inspection, and Maintenance

All field and laboratory analytical instruments and equipment will be tested, inspected, and maintained according to the manufacturer's guidelines and recommendations. Data collected from improperly functioning equipment will not be used. The equipment testing, inspection, and maintenance logs for all contractor equipment must be made available to the DEQ project manager or his/her representative upon request.

## 2.7. Instrument/Equipment Calibration and Frequency

All field and laboratory instruments and equipment used for measurement data will be operated and calibrated according to manufacturer's guidelines and recommendations. Calibration records must include the following information (whenever available and appropriate for the specific instrument or equipment):

- calibration date
- test method
- instrument
- analysis date
- each analyte's name
- analyst's initials or signature
- concentration and response
- calibration curve or response factor

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<sup>1</sup> This definition may be updated based on project specific DQOs that are defined in a site specific SAP.

Only personnel properly trained in these procedures should operate and calibrate the instruments. Calibration records must be made available to the DEQ project manager or his/her representative upon request.

## **2.8. Inspection/Acceptance of Supplies and Consumables**

All supplies and consumables should be examined for damage or other characteristics that would otherwise compromise data quality. Contractors and laboratories must have written procedures for inspecting and accepting supplies and consumables in their Quality Management Plans or Quality System Manuals.

## **2.9. Non-Direct Measurements**

Data from non-measurement sources, such as computer databases, computer programs, or scientific publications, must be approved for use by DEQ in this QAPP, or in a site-specific SAP, that complies with the requirements of OAR 340-122-0250.

## **2.10. Data Management**

Field data from Brownfield projects, such as sample ID and latitude/longitude coordinates, are recorded on field data sheets or hand-held computers. Field data is reported to the project manager through submission of field notebooks or field sampling data sheets, if used, by DEQ or contractor field staff. Laboratory analytical data should be submitted to the DEQ project manager in both printed and electronic form. Rapid turnaround laboratory data is reported to the project manager, if requested, but rapid turnaround is generally not required for Brownfield projects. The project manager or his/her designee will update the ECSI database. Alternatively, the project manager or his/her designee may record analytical data from Brownfield projects in DEQ LEAP's LIMS database, or in other DEQ databases that may be designed to store analytical data from specified locations.

## **3. Assessment and Oversight**

### **3.1. Assessment and Response Actions**

For long-term sampling projects, the DEQ project manager will meet at least weekly with field crews to discuss any problems, and ensure that all planned samples are being collected. For such sites, the project manager will review data weekly, observe sampling, and arrange re-sampling as needed. Contract laboratories will participate in Performance Evaluation studies twice yearly and satisfy NELAP requirements. Personnel responsible for data assessment will check the results of every sampling event for precision and completeness. Technical and/or quality system audits of environmental or laboratory contractors may be initiated on a prescribed schedule or on an as-needed basis in response to identified or suspected problems. Assessment and response actions will be documented and submitted to the DEQ project manager. Identified deficiencies will be followed up by written corrective action plans.

### **3.2. Reports to Management**

Project managers are responsible for reporting Brownfield activities to program managers in their respective regions. Procedures for preparing these reports may vary between regions.

# 4. Data Validation and Usability

## 4.1. Data Review, Verification, and Validation

Data review, verification, and validation procedures and requirements are discussed in Section 2.5 - Quality Control.

## 4.2. Verification and Validation Methods

The most common source of validation criteria is the *USEPA Contract Laboratory Program (CLP) National Functional Guidelines (NFGs) for Organic Data Review* and *USEPA Contract Laboratory Program (CLP) National Functional Guidelines (NFGs) for Inorganic Data Review*. The functional guidelines were written for use with the EPA Contract Laboratory Program, and have very specific criteria. Some of the CLP criteria is not applicable to other EPA analytical methods or extended analyte lists and therefore the validator has to use professional judgement when using the functional guidelines.

Qualification of analytical results during the validation process usually use the flags listed in section 2.5.4. If other sources of data validation criteria are to be used, they must be identified in the project SAP.

If the DEQ LEAP is incorporating the data into their database:

DEQ validates the data against performance measures and DQOs established in this QAPP and in site-specific SAPs, may assign QC data quality levels of A, B, C, D, E, and F following the criteria detailed in DEQ guidance document; *Data Validation and Qualification* (DEQ09-LAB-0006-QAG) used by DEQ's QA section, which is specific to the analytical method, sample matrix, and the analyte of interest:

- **A – Data of known Quality;** meets QC limits established in a DEQ approved QAPP.
- **B – Data of known but lesser quality;** Data may not meet established QC but is within marginal acceptance criteria; or data value may be accurate, however controls used to measure Data Quality Objective (DQO) elements failed (e.g., batch failed to meet blank QC limit); the data is generally usable for most situations or in supporting other, higher quality data. **(Equivalent to the “J+”/”J-“ (estimated) qualifiers used by EPA see above)**
- **C – Data of unacceptable quality;** Generally due to QC failures but may be related to other known information about the sample. Data should not be used for quantitation purposes but may have qualitative use. **(Equivalent to the “R” (rejected) validation qualifier used by EPA)**
  - **Note:** In rare instances, a project manager may still be able to use some “C” data (mostly Field generated) in their project if the data can still support the decisions that need to be made. In these cases, the project manager should document in their project report the basis as to why the “C” data was found to be acceptable.
- **D – No data available;** No sample collected or no reportable results. Samples are either voided or canceled.
- **E – Data of unknown quality;** Insufficient QA/QC or other information available to make determination. Data could be acceptable; however, no evidence is available to prove either way. Data is provided for Educational Use Only.
- **F – Exceptional Event;** "A" quality data (data is of known quality), but not representative of sampling conditions as required by project plan (e.g., an air particulate sampler fails to sample the full time period because adverse conditions such as a forest fire overloaded the sampling equipment).

DEQ uses the validation criteria found in *Data Validation and Qualification* (DEQ09-LAB-0006-QAG) as guidance for applying DQLs to the data. The DEQ QA section should be contacted when developing DQL criteria for site-specific SAPs that are different than that found in this QA Plan.

### **4.3. Reconciliation with User Requirements**

The project manager will ensure that data collected during Brownfield projects address the agency's needs for evaluating that site. Moreover, the project manager will ensure that all environmental and laboratory contractors satisfy requirements specified in this QAPP, in site-specific SAPs, and in any binding contracts between parties. The laboratory conducting sample analyses will submit all QC data identified in this plan (Section 2) with its analytical data.

Data review, verification, and validation procedures and requirements are discussed in Section 2.5 and section 4.2. For the purposes of this QA Plan, analytical data with DQLs of A, or B (or non – 'R' flagged if using the scheme in section 2.5.4) will normally be acceptable for use. If the DEQ project manager feels that data with the Quality level of "C" or "R" is satisfactory for their needs it must be clearly documented in their final report as to how the DQOs can still be met.

# 5. Version History

Revision	Date	Changes	Editor
2.0	10/10/2011	<p>General changes to reflect restructure of Cleanup Program and updates to make document current throughout.</p> <p>A7 – Requirement for laboratories to have a NELAP-like quality system</p> <p>A9.2 – Added language on sample acceptance policies</p> <p>B1 – Clarified language on sampling plan expectations</p> <p>B2 – Update method references</p> <p>Table B2-1 Updated container and preservation and holding time requirements, added asbestos, Cr+6</p> <p>Table B4-1 Updated method references. Added Cr+6, Sulfides, Chemical Agents and Asbestos</p> <p>B5.2.2 – Added blanks to be consistent to QA policy</p> <p>B5.4 – Added requirement for data qualification for exceptions</p> <p>B5.4.2 – better differentiated SRM, LCS, and Matrix Spike in Accuracy discussion.</p>	AD, SH
3.0	11/30/2016	<p>Reformatted and renumbered document to new agency format.</p> <p>1.11.2 - added information re: lab reports</p> <p>2.2 - added reference to LQ soil VOC sampling policy</p> <p>2.2.1- added references to ISM and added note on composite samples.</p> <p>Table 2-2 - removed chemical agents and added fuels, updated method references</p> <p>2.3 - added extensive custody procedure detail (field and laboratory)</p> <p>2.4.3 – updated laboratory QC requirements</p> <p>2.4.4 – added more information re: Representativeness</p> <p>4.2 – rewrote validation information</p> <p>4.3 – added discussion on usability</p> <p>Editorial edits throughout.</p>	SCH, KR, MC, GW