Monitoring Report for CSMRI Creekside Facility First Quarter 2006

Prepared for:

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1. Introduction

This report presents the first quarter 2006 results for air monitoring, groundwater monitoring, and surface water monitoring conducted at the Colorado School of Mines Research Institute (CSMRI) Creekside facility, Golden, Colorado. The monitoring was conducted by the S.M. Stoller Corporation (Stoller) under the guidance of the Colorado School of Mines (CSM).

2. Sampling and Analysis

Stoller obtained groundwater samples from four monitoring wells at the Creekside facility on March 15, 2006. Groundwater samples were obtained from monitoring wells CSMRI-1, CSMRI-2, CSMRI-4, and CSMRI-5. The monitoring well locations are shown on Figure 1. Also on March 15, 2006, samples were collected from the two surface water sample locations SW-1 and SW-2, shown on Figure 1. Sampling was also conducted monthly on filters from two onsite air monitor stations, AS-East and AS-West, located as shown on Figure 1.

2.1 Atmospheric Monitoring

Particulate monitoring was conducted at two locations within the Creekside property at the locations shown on Figure 1. The particulate monitoring samples were obtained from stations AS-East and AS-West. The monitoring was conducted using high-volume air sampling pumps with 47-millimeter-diameter filters. The pumps have run continuously beginning February 15, 2005. The pump filters are collected monthly and sent to the analytical laboratory for analysis. Samples were collected following the procedures outlined in Appendix A, Long-Lived Airborne Radioparticulate Survey procedures. The samples from each pump were analyzed for gross alpha, gross beta, Ra-226, Th-228, Th-230, Th-232, U-234, U-235, U-238, and total U.

The pumps are placed about 4 feet off the ground. The pumps are located in protective housing that prevents precipitation from contacting the samplers but still allows air circulation around the samplers. The air samplers were brought on line in mid-February 20005, resulting in only one set of air data for the first quarter 2005 report. Three sets of air data are included in the first quarter 2006 report.

2.2 Groundwater Sampling

Groundwater samples were obtained from monitoring wells CSMRI-1, CSMRI-2, CSMRI-4, and CSMRI-5. The wells are located as shown on Figure 1. Samples were collected following the procedures outlined in Appendix B, Groundwater Sampling procedures. Sample collection forms that record the conditions of the well water as it is developed and the quantity removed during purging are provided in Appendix C. All monitor wells have depth to water measured to the nearest 1/100th of a foot prior to sample purging. Plots of depth to water relative to the top of casing (TOC) measuring point are presented as Figure 2 for monitor wells CSMRI-1, CSMRI-4, and CSMRI-5; and as Figure 3 for monitor well CSMRI-2. The Figure 2 hydrograph reflects the seasonal trends of flow in Clear Creek due to the proximity of the monitor wells to the creek. The Figure 3 hydrograph for monitor well CSMRI-2, located near the southeast corner of the freshman parking lot on West Campus Drive and an open irrigation ditch, reflects the use of and leakage from the drainage ditch during the summer months.

2.3 Surface Water Sampling

Surface water samples were collected from two locations along Clear Creek: Location SW-1 is located upstream of the site and SW-2 is located downstream of the site. Samples were collected on March 15, 2006, at which time the measured flow at the USGS Golden, Colorado Clear Creek gauging station was appears to have been affected by ice (<u>USGS Surface Water Online Database</u>). Historical data (31 years) indicate a median daily stream flow of approximately 45 cubic feet per second for March 15.

Surface water samples were collected following the Surface Water Sampling procedures in Appendix D from the locations as shown on Figure 1. A graph of the flow in Clear Creek during the first quarter from January 1st through March 31st is attached as Figure 4. The figure shows flow from mid-January through March 20th is estimated due to ice affecting the stream flow gauge.

2.4 Analyses

All samples collected were analyzed using a Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)-certified analytical laboratory. The results received from the laboratory were evaluated based on the following parameters:

- Data completeness
- Holding times and preservation
- Instrument initial calibrations
- Instrument performance checks
- Preparation blanks
- Duplicate sample results
- Laboratory control samples results
- Compound quantitation and reporting limits (full validation only)

Data collected during this quarter by Stoller met all the criteria for these parameters. The data validation reports are attached in Appendix E.

2.4.1 Atmospheric Analyses

Paragon Analytics, Inc. of Fort Collins, Colorado, performed laboratory analyses of the air monitoring filters. The filters for each of the two sampling locations were analyzed for gross alpha, gross beta, Ra-226, Th-228, Th-230, Th-232, U-234, U-235, U-238, and total U. The results of these analyses are shown in Appendix F. A summary of the results is presented in Table 2-1. Where negative values exist, they are within uncertainty boundaries.

2.4.2 **Groundwater Quality Analyses**

Paragon Laboratories, Inc. conducted laboratory analyses. The groundwater and surface water samples were analyzed for the metals Ag, As, Ba, Ca, Cd, Cr, Hg, K, Mg, Mo, Na, Pb, Se, V, and Zn as well as the radioisotopes Ra-226, Ra-228, Th-228, Th-230, Th-232, U-234, U-235, U-238, and total U.

An equipment blank was also analyzed for quality control purposes, as described in the Data Validation Report. Results of these analyses are included as Appendix E, and the chain-of-

custody documentation is included as Appendix G. A summary of groundwater results for radioisotopes and metals is presented in Table 2-2 and Table 2-3, respectively. Groundwater parameters are reported as dissolved concentration in milligrams per liter (mg/l) for metals; picoCuries per liter (pCi/l) for radioisotopes; and micrograms per liter (ug/l) for total uranium. Groundwater samples were measured onsite for temperature, pH, and specific conductance during the purging and sampling process. Onsite measurement parameters are presented on the sample collection log forms in Appendix C.

2.4.3 Surface Water Analyses

A summary of surface water results for radioisotopes and metals is presented in Table 2-4 and Table 2-5, respectively. Surface water parameters are reported as total concentration in mg/l for metals; pCi/l for radioisotopes; and ug/l for total uranium. Surface water samples were measured onsite for temperature, pH, and specific conductance as the sampling was conducted. Onsite measurement parameters are presented on the sample collection log forms in Appendix C.

2.5 Health and Safety Program

Stoller developed a program to protect the health and safety of field personnel for the implementation of the environmental monitoring at the Creekside facility. This program has been developed in accordance with the requirements of 29 CFR 1910.120.

3. Results

Results from samples collected from the CSMRI Site during the first quarter of 2006 are summarized on Tables 2-1 through 2-5. Table 2-6 presents historical data for select contaminants of potential concern in groundwater at the site that were collected by previous consultants. Each type of sample collected from the site is discussed in detail in the following sections. Quarterly data for year 2005 are presented in Tables 2-7 through 2-11.

3.1 Atmospheric Results

Results from the two air sampling stations are summarized in Table 2-1. Station AS-West is located in the western portion of the site, essentially upwind from the impacted area, and station AS-East is located in the eastern portion of the site, downwind from the impacted area. The analytical results indicate no significant difference between the two sample locations. This indicates limited airborne emissions from the site during this sampling period. All results are well below Colorado air standards as shown on Table 2-1.

3.2 Groundwater Conditions

Groundwater wells are located in areas likely to detect any impacts to groundwater emanating from the site as well as locations that represent background water quality. Wells CSMRI-4 and CSMRI-5 are located downgradient from the site near Clear Creek. Well CSMRI-1 is located along Clear Creek upstream from the site, and well CSMRI-2 is located offsite on the southeast corner of the freshman parking lot on West Campus Drive.

3.3 Groundwater Quality

Total U in monitor well CSMRI-4 was detected at a concentration of 27.1 ug/l. This value is less than the National Primary Drinking Water Standards Maximum Contaminant Levels (MCLs) of 30 ug/l for this compound. This groundwater well has historically had elevated concentrations of total U but the values have been declining since 1991. Figure 5 illustrates the decreasing concentration of total U in CSMRI MW-4 since 1991. The historical data presented in Table 2-6 are presented in pCi/l as "activity" yet recent (2005 and 2006) analytical data are presented in ug/l as "mass concentration." The December 7, 2000 Federal Register discusses the final uranium MCL and presents a conversion factor of a geometric average mass:activity ratio of 0.9 pCi/g for values near the MCL, based on data from the National Inorganics and Radionuclides Survey. Figure 6 presents the total U concentration for 2005 and 2006 for monitor well CSMRI MW-4 and also presents the depth to the water table relative to feet below the TOC. The figure indicates the concentration of total U is fluctuating near the MCL of 30 ug/l for four sampling events in 2005 and one sampling event in 2006.

All other tested compounds in all wells are below established MCLs. The groundwater beneath the site is not used for drinking water.

3.3.1 Comparison of Upgradient and Downgradient Groundwater Quality

Wells CSMRI-4 and CSMRI-5 are downgradient from the site, and wells CSMRI-1 and CSMRI-2 are upgradient from the site. Metals concentrations above detection limits in the upgradient wells tend to be lower than detected concentrations in downgradient wells. For radionuclides, the downgradient wells CSMRI-4 and CSMRI-5 indicate activity levels of radioisotopes (TH-228, Th-232, U-234, U-235, U-238 and total U) greater than upgradient wells but below the MCLs. Conversely, upgradient well CSMRI-2 indicates activity levels of radioisotopes (Ra-226, Ra-228 TH-230) greater than the downgradient wells but well below the MCLs.

As shown on Figure 6 for CSMRI-4 data, there appears to be a seasonal correlation between fluctuations in depth to the water table measured from the TOC and the concentration of total U. Total U was detected at a concentration of 27.1 ug/l, which is less than the MCL of 30 ug/l. Continued sampling and monitoring of the water quality and fluctuating water table will be conducted at this monitor well.

3.3.2 Comparison with Previous Groundwater Quality Analyses

Table 2-6 presents past sampling events data for a select group of radioisotopic compounds. The data indicate a slight decreasing trend in contaminant concentrations over time, indicating improving groundwater quality. As additional data are collected and trends become more defined, graphs of concentration versus time will be produced and presented. This analytical data will be incorporated into Figure 6 to show longer-term trends and correlation between the detected concentration of total U and a fluctuation water table.

3.3.3 Comparison with Colorado Groundwater Standards

The statewide dissolved concentration standard of 5 pCi/l for Ra-226 and Ra-228 in groundwater set by the State of Colorado Water Quality Control Commission is not exceeded in any of the monitoring wells sampled. The statewide dissolved concentration standard for groundwater for the sum of Th-230 and Th-232 at 60 pCi/l was not exceeded in any of the monitoring wells sampled.

3.4 Surface Water Quality

Surface water samples are collected from two locations at the site. Location SW-1 is upstream from the site and SW-2 is downstream from the site.

The upstream and downstream surface-water concentrations of all metals and radionuclides detected at the CSMRI Creekside facility from stations SW-1 and SW-2 were similar. The metals detected above the detection limit were Ca, K, Mg, Na, and Zn. No established MCLs were exceeded.

4. Activities for First Quarter 2006

First quarter 2006 activities at the site included the sampling and monitoring as described above.

5. References

USGS Surface Water website: http://nwis.waterdata.usgs.gov

Summary of Radioisotopes in Air Table 2-1

(All results in microcuries per milliliter)

				(All IC)	(All Icsuits III IIIICIOCUITES pei 1	curies per r	mmmer)				
Sample	Sample	Gross	Gross Alpha	Gros	Gross Beta	Ra	Ra-226	E	Th-228		Th-230
Station	Date	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty
AS-East	1/19/2006	8.71E-16	3.02E-16	6.05E-15	1.14E-15	1.17E-16	1.42E-16	3.20E-17	7.82E-17	9.96E-17	1.53E-16
AS-West	1/19/2006	5.09E-16	2.31E-16	7.36E-15	1.35E-15	1.07E-16	1.17E-16	1.07E-17	6.76E-17	9.96E-17	1.39E-16
AS-East	2/16/2006	8.38E-16	3.05E-16	9.79E-15	1.75E-15	9.91E-17	1.33E-16	-3.81E-17	9.91E-17	-7.62E-17	1.07E-16
AS-West	2/16/2006	7.85E-16	2.93E-16	1.04E-14	1.83E-15	-6.10E-17	1.60E-16	3.43E-17	1.14E-16	-2.29E-17	1.18E-16
AS-East	3/15/2006	8.30E-16	3.12E-16	1.39E-14	2.41E-15	-5.93E-17	2.13E-16	2.77E-17	1.11E-16	-4.74E-17	1.15E-16
AS-West	3/15/2006	8.46E-16	3.20E-16	1.27E-14	2.21E-15	-5.53E-17	1.58E-16	7.90E-18	9.88E-17	7.51E-17	1.38E-16
Unrestrict	Jnrestricted use limit*		빌	_	¥	,x6	9x10 ⁻¹³	XE.	3x10 ⁻¹⁴	2x	2x10 ⁻¹⁴

*6 CCR 1007-1 Part 4, Appendix 4B, Table 4B-2, assuming Class W NE – Not Established

Summary of Radioisotopes in Air (continued) Table 2-1

(All results in microcuries per milliliter)

				71 117 7	(partition of componion in cincol in the	ocarios por	, 1011111111				
Sample	Sample	Ţ	Th-232	ם	U-234	U-235	235	' 'n	U-238	To	Total U
Station	Date	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty
AS-East	1/19/2006	4.98E-17	6.05E-17	2.13E-16	1.35E-16	7.11E-18	6.76E-17	6.76E-17	7.82E-17	2.88E-16	1.71E-16
AS-West	1/19/2006	7.11E-18	4.27E-17	1.53E-16	1.14E-16	0	7.47E-17	8.54E-17	8.18E-17	2.42E-16	1.56E-16
AS-East	2/16/2006	2.29E-17	4.95E-17	1.52E-16	9.91E-17	6.48E-17	6.86E-17	1.64E-16	1.03E-16	3.81E-16	1.56E-16
AS-West	2/16/2006	4.95E-17	5.33E-17	8.38E-17	7.24E-17	-1.14E-17	4.95-17	4.95E-17	6.10E-17	1.22E-16	1.07E-16
AS-East	3/15/2006	7.90E-18	4.74E-17	6.32E-17	7.90E-17	-3.95E-18	7.90E-17	3.16E-17	6.72E-17	9.09E-17	1.30E-16
AS-West	3/15/2006	3.16E-17	4.35E-17	8.30E-17	6.72E-17	2.37E-17	4.74-17	2.37E-17	3.95E-17	1.34E-16	9.09E-17
Unrestrict	Unrestricted use limit*	4x.	4×10 ⁻¹⁵	,1 x	1×10 ⁻¹²	1x.	1x10 ⁻¹²	1x1	1×10 ⁻¹²	X 6	9x10 ⁻¹³

*6 CCR 1007-1 Part 4, Appendix 4B, Table 4B-2, assuming Class W

Summary of Radioisotopes in Groundwater Table 2-2

(All results in picoCuries per liter)

Sample		Ra	Ra-226	Ra	Ra-228	Th-228	-228	Ė	Th-230
Station	Sample Date	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty
CSMRI-1	3/15/2006	-0.15	0.41	0.58	0.66	0.025	0.044	0.032	0.061
CSMRI-2	3/15/2006	1.25	0.46	2.53	0.93	0.03	0.067	0.204	0.098
CSMRI-4	3/15/2006	0	0.18	0.38	0.54	0.004	0.044	0.174	0.087
CSMRI-5	3/15/2006	0.57	0.35	0.45	0.49	0.038	0.076	0.144	0.092
M	MCL*		Total Ra = 5	a = 5		2	빙	Th 230 + 1	Th 230 + Th 232 = 60**

*Maximum Contaminant Level – National Primary Drinking Water Regulations
**5 CCR 1002-41 Reg 41 – Colorado Groundwater Standards
NE - Not Established

Summary of Radioisotopes in Groundwater (continued) Table 2-2

(All results in picoCuries per liter)

ertainty Result Uncertainty Result I. 0.13 0.92 0.31 2.8 0.058 0.45 0.15 1.36 0.17 9 1.6 27.1 0.061 1.38 0.34 4.1 NB NB 30	Sample	Sample	Ŧ	Th-232	ວ ່	U-234	3	U-235	3	U-238	Total	Total U (uq/l)
3/15/2006 -0.004 0.019 1.76 0.46 0.11 0.13 0.92 0.31 2.8 7.8 3/15/2006 0.012 0.023 0.83 0.23 0.066 0.058 0.45 0.15 1.36 1.36 3/15/2006 0.007 0.026 1.81 0.41 0.058 0.061 1.38 0.34 4.1 1.4 MCL* Th 230 + Th 232 = 60** NE NE NE NE NE NE 30	Station	Date	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty	Result	Uncertainty
3/15/2006 0.012 0.023 0.83 0.23 0.066 0.058 0.045 0.15 1.36 1.36 1.36 1.36 1.36 1.36 1.36 1.36 1.36 1.36 1.37 1.36 1.37	CSMRI-1	3/15/2006	-0.004	0.019	1.76	0.46	0.11	0.13	0.92	0.31	2.8	0.93
3/15/2006 0.007 0.02 9 1.6 0.43 0.17 9 1.6 3/15/2006 0.019 0.026 1.81 0.41 0.058 0.061 1.38 0.34 MCL* Th 230 + Th 232 = 60** NE NE NE NE NE	CSMRI-2	3/15/2006	0.012	0.023	0.83	0.23	0.066	0.058	0.45	0.15	1.36	0.46
3/15/2006 0.019 0.026 1.81 0.41 0.058 0.061 1.38 NCL* NE NE NE NE NE NE NE NE NE	CSMRI-4	3/15/2006	0.007	0.02	6	1.6	0.43	0.17	6	1.6	27.1	4.8
Th 230 + Th 232 = 60** NE	CSMRI-5	3/15/2006	0.019	0.026	1.81	0.41	0.058	0.061	1.38	0.34	4.1	٢
	Σ	۲.* در:	Th 230 + T	h 232 = 60**		Щ		빌	_	当		000

*Maximum Contaminant Level – National Primary Drinking Water Regulations
**5 CCR 1002-41 Reg 41 – Colorado Groundwater Standards
NE - Not Established

ug/1 - micrograms per liter

Summary of Metals in Groundwater Table 2-3

						(All r	esults	(All results in milligrams per liter)	s per	liter)						
Sample Station	Sample Date	Ag	As	Ba	Ca	PS	ပ်	Hg	×	⊠	Mo	Na	Pb	Se	λ	Zn
CSMRI-1	3/15/2006	8	Q	0.064 (B)	33	QN	ND	0.00002 (B)	2.6	10	0.0013 (B)	24	ND	Ω	Ω	0.049
CSMRI-2	3/15/2006	QN	QN	(B) 60.0	74	QN	ΩN	0.000023 (B)	6.1	31	ΩN	17	ΩN	ΩN	QN	0.0059 (B)
CSMRI-4	3/15/2006	Ð	g	0.042 (B)	81	QN	QN	0.000034 (B)	5	35	0.021	59	QN	QN	0.00056 (B)	0.21
CSMRI-5	3/15/2006	QN	QN	0.058 (B)	70	0.00037 (B)	ND	0.000029 (B)	3.5	26	0.0031 (B)	59	ND	0.0035 (B)	0.00067 (B)	0.11
Detecti	Detection Limits	0	0	0.1	-	0.005	0	0.0002	1	-	0.01	1	0.00	0.005	0.01	0.02
Σ	MCL*	빌	0.010	2	Ш Ш	0.005	0.1	0.002	빌	岁	W _Z	岁	0.01	0.05	IJN.	Ш

*Maximum Contaminant Level – National Primary Drinking Water Regulations
ND – Non Detect
NE – Not Established
(B) – Detected above Instrument Detection Level but below Reported Detection Level

Summary of Radioisotopes in Surface Water Table 2-4

(All results in picoCuries per liter)

III COMPANY IN IN			J	_ I	ı		-		
Ka-226	Ka-226	-7.76		ά. Υ	Ka-228		1n-228	=	Ln-230
Sample Date Result Uncertainty	ח	Uncertainty		Result	Uncertainty	Result	Uncertainty	Result	Uncertainty
3/15/2006 -0.16 0.27		0.27		0.35	0.52	0.059	0.081	0.125	0.085
3/15/2006 -0.04 0.24		0.24		-0.15	0.52	600.0	0.056	0.184	0.092
MCL* Total Ra 5	Total Ra	Total Ra	Ra	5			및 및	Th 230 + T	Th 230 + Th 232 = 60**

*Maximum Contaminant Level – National Primary Drinking Water Regulations **5 CCR 1002-31 Reg 31 – Colorado Surface Water Standards NE – Not Established

Summary of Radioisotopes in Surface Water (continued) (All results in picoCuries per liter) Table 2-4

ſ						
	Total U	Uncertainty	(48/1)	0.52	0.53	30
		Result	(1,65)	1.59	1.52	
	U-238	Uncertainty	On contrainty	0.17	0.18	LZ.
	•	Resuff		0.53	0.51	
	35	Uncertainty	Silver rains	0.053	0.048	
	U-235	Result		0.029	0.004	Z
1	U-234	Uncertainty	(0.19	0.23	¥
	כ	Result		9.0	0.79	
000	I n-232	Result Uncertainty		0.023	0.021	Th 230 + Th 232 = 60^{**}
F	-	Result		0.005	0.01	Th 230 +
		Sample Date		3/15/2006	3/15/2006	MCL*
		Sample Station		SW-1	SW-2	Ž

*Maximum Contaminant Level – National Primary Drinking Water Regulations
**5 CCR 1002-31 Reg 31 – Colorado Surface Water Standards
NE – Not Established

ug/l - micrograms per liter

Table 2-5

Summary of Metals in Surface Water (All results in milligrams per liter)

ı	7	0.19		0.2		0.02	빌
	>	0.00067	(B)	0.00053	(B)	0.01	IJN.
	Se.	QN		QN			0.05
	- 1	Ω		2		0.003	0.015
	Š	23		25		-	NE
	O[A	0.0048	(B)	0.0046	(B)	0.01	NE
		8.5		8.9		-	NE
•	¥	3.7		3.8		-	NE E
•	Нg	0.000024	<u>B</u>	0.000022	(B)	0.0002	0.002
ċ	5	0.00047	(B)	0.00055	(B)	0.01	0.1
Č	3	0.00084	(B)	0.00053	(B)	900.0	0.005
ć	S	37		39		1	NE
Ď	ра	0.04	(B)	0.042	(B)	0.1	2
•	AS	2		9		0.01	0.01 0.010
	₩	9		2		0.01	0.01
Sample	Sample Date	3/15/2006		3/15/2006		ction Limits	MCLs*
	\neg	SW-1		C-W/2	7.10	Detec	~
		Sample Date Ag As Ba Ca Cd Cr Hg K Mg Mo Na Pb Se V	Sample Date As As Ba Ca Cd Cr Hg K Mg Mo Na Pb Se V 3/15/2006 ND ND 0.004 37 0.00047 0.000024 3.7 8.5 0.0048 23 ND ND 0.00067	Sample Date As As Ba Ca Cd Cr Hg K Mg Mo Na Pb Se V 3/15/2006 ND ND 0.04 37 0.00084 0.000047 0.000024 3.7 8.5 0.0048 23 ND ND 0.00067 (B) (B) (B) (B) (B) (B) (B) (B)	Sample Date As As Ba Ca Cd Cr Hg K Mg Mo Na Pb Se V 3/15/2006 ND ND 0.04 37 0.00084 0.000047 0.000024 3.7 8.5 0.0048 23 ND ND 0.00067 (B) 3/15/2006 ND ND 0.00053 0.00055 0.000052 3.8 8.9 0.0046 25 ND ND 0.00053	Sample Date As As Ba Ca Cd Cr Hg K Mg Mo Na Pb Se V 3/15/2006 ND 0.04 37 0.00084 0.00047 0.000024 3.7 8.5 0.0048 23 ND ND 0.00067 (B) <	Sample Date As As As Ca Ca Cr Hg K Mg Mo Na Pb Se V 3/15/2006 ND ND 0.04 37 0.00084 0.000024 3.7 8.5 0.0048 23 ND ND 0.00067 3/15/2006 ND ND 0.042 39 0.00053 0.00055 0.000022 3.8 8.9 0.0046 25 ND ND 0.00053 9ction Limits 0.01 0.01 0.1 0.1 0.005 0.01 0.002 1 1 0.003 0.005 0.01 0.01 0.01 0.005 0.01 0.002 1 1 0.003 1 1 0.003 0.005 0.01 0.000 0.01 0.01 0.01 0.01 0.01 0.000 0.01 0.000 0.01 0.01 0.000 0.01 0.000 0.01 0.000 0.01 0.000 0.01 0.000

*Maximum Contaminant Level - National Primary Drinking Water Regulations

ND - Non Detect

 $\label{eq:NE-Not Established} NE-Not Established \\ (B)-Detected above Instrument Detection Level but below Reported Detection Level$

CSMRI Historical Groundwater Data (Previous Consultants) Table 2-6

(All results in picoCuries per liter)

			TO CO T TTT 7)	(tall reduced the prediction between	Per mer)			
Well ID (d)	Analyte	1/1991 (a)	6/1991 (a)	3/1999 (b)	6/1999 (b)	10/1999 (b)	2/2003 (c)	4/2003 (c)
CSMRI-1	Ra-226			0.1	0.3	0.2	<0.55	<0.45
	U Total			2.09	2.59	1.44	2.4	2.88
	Th-230			0.4	0.2	0.2	<0.19	0.21
CSMRI-2	Ra-226		1.9	1.9	1.4	1.4	1.4	2.8
	U Total	11	5.7	0.55	1.46	0.71	1.2	1.27
	Th-230		0	0.1	0.1	6.0	<0.17	0.43
CSMRI-3	Ra-226		9.0	1.5	1.2	1.6	<0.75	<0.81
	U Total	17	10.4	8.41	12.4	10	12	12
-	Th-230		0	0.3	0.3	1.1	<0.12	<0.15
CSMRI-4	Ra-226		-	<0.4	9.0	0.4	<0.85	<0.42
	U Total	98	57.3	23.4	58.6	33.7	16	34.2
	Th-230		0	7.0	0.3	0.4	<0.099	<0.15
CSMRI-5	Ra-226		9.0	2.4	3.3	2.7	<0.49	1.1
	U Total	14	16.8	3.6	3.6	4	2.8	2.28
	Th-230		0	0.2	0.2	1.4	0.062	<0.14
Noto:								

Notes:
a - Samples collected by Grant and Associates and analyzed by Barringer Labs
b - Samples collected by URS Greiner Woodward Clyde and analyzed by CORE Labs
c - Samples collected by URS Greiner Woodward Clyde and analyzed by Paragon Analytics; Total U activity calculated from concentration reported by Paragon.
c - Samples collected by New Horizons Environmental Consultants and analyzed by Paragon.
d - Well Identification numbers changed from the 1991 data to the 1999 data. Data presented account for this change

Table 2-7
Historical Summary of Radioisotopes in Air (Stoller)
(All results in microCuries per milliliter)

				יייייייייייייייייייייייייייייייייייייי	THE THIRD CO.	And results in miscolaries per minimiscol	111101)				
	Sample	Gross	Gross								
Sample Station	Date	Alpha	Beta	Ra-226	Th-228	Th-230	Th-232	U-234	U-235	U-238	Total U
AS-East	3/17/05	1.3E-15	1.3E-14	1.4E-16	6.8E-17	7.1E-17	4.1E-17	2.5E-16	1.3E-17	8.2E-17	3.5E-16
	4/18/05	1.2E-15	1.2E-14	5.3E-17	1.7E-17	8.7E-17	3.0E-18	9.8E-17	1.0E-17	3.2E-17	1.4E-16
	5/11/05	6.1E-16	8.0E-15	9.3E-18	5.1E-17	1.4E-17	-3.3E-18	7.5E-17	-3.3E-17	4.8E-17	1.2E-16
	6/14/05	7.2E-16	1.1E-14	6.3E-17	-4.4E-17	2.5E-17	1.7E-17	6.1E-17	6.0E-18	3.1E-17	9.7E-17
	7/12/05	5.11E-16	1.3E-14	0	9.5E-17	9.5E-17	2.1E-17	9.1E-17	1.6E-17	4.5E-17	1.5E-16
	8/16/05	9.1E-16	1.6E-14	1.1E-16	1.1E-16	0	7.9E-18	1.5E-16	1.2E-18	2.8E-17	1.8E-16
	9/14/05	1.3E-15	1.5E-14	-6.3E-17	4.8E-17	4.8E-17	3.6E-17	6.7E-17	0	3.7E-18	7.0E-17
	10/11/05	1.78E-15	1.43E-14	7.31E-16	6.32E-17	1.98E-17	-3.16E-18	8.30E-17	9.88E-18	2.77E-17	1.22E-16
	11/10-05	1.14E-15	1.31E-14	1.64E-16	3.56E-17	7.47E-17	1.60E-16	8.18E-17	1.42E-17	8.89E-17	1.85E-16
	12/20/05r	9.60E-16	5.44E-15	2.03E-16	2.40E-17	-6.16E-17	2.93E-17	2.93E-17	8.00E-18	5.60E-17	9.60E-17
AS-West	3/17/05	1.4E-15	1.5E-14	2.5E-16	2.5E-17	0	3.3E-17	4.2E-16	7.1E-18	7.3E-17	5.0E-16
	4/18/05	1.2E-15	1.2E-14	-1.0E-17	1.7E-17	-2.3E-17	2.5E-17	2.5E-16	1.2E-17	5.5E-17	3.1E-16
	5/11/05	5.8E-16	8.0E-15	-1.3E-16	-4.7E-18	3.3E-17	1.5E-17	1.7E-16	1.4E-17	4.6E-17	6.5E-17
	6/14/05	8.8E-16	9.8E-15	1.0E-16	8.5E-18	1.6E-17	7.5E-17	1.4E-16	1.4E-17	3.0E-17	1.9E-16
	7/12/05	8.8E-16	1.4E-14	2.7E-17	7.6E-18	2.3E-17	3.4E-17	2.2E-16	2.3E-17	7.6E-17	3.2E-16
	8/16/05	1.2E-16	1.5E-14	2.0E-16	2.1E-17	1.0E-16	1.1E-17	4.9E-17	1.8E-17	6.4E-18	7.3E-17
	9/14/05	1.4E-15	1.5E-14	-1.1E-17	5.9E-17	7.0E-17	7.0E-18	8.1E-17	0	3.8E-17	1.2E-16
	10/11/05	1.62E-15	1.6E-14	2.29E-15	2.77E-17	3.16E-17	7.11E-18	1.86E-16	5.02E-17	9.88E-17	3.32E-16
	11/10-05	1.85E-15	1.48-14	8.18E-17	-2.13E-17	-2.13E-17	2.49E-17	9.25E-17	1.07E-17	2.49E-17	1.28E-16
	12/20/05r	7.90E-16	1.03-14	2.67E-17	1.33E-17	-5.87E-17	1.87E-17	9.87E-17	1.60E-17	5.07E-17	1.63E-16
Unrestricted use limit*	e limit*	빌	빙	9E-13	3E-14	2E-14	4E-15	1E-12	1E-12	1E-12	9E-13

* 6 CCR 1007-1 Part 4, Appendix 4B, Table 4B-2, assuming Class W NE - Not Established

Table 2-8

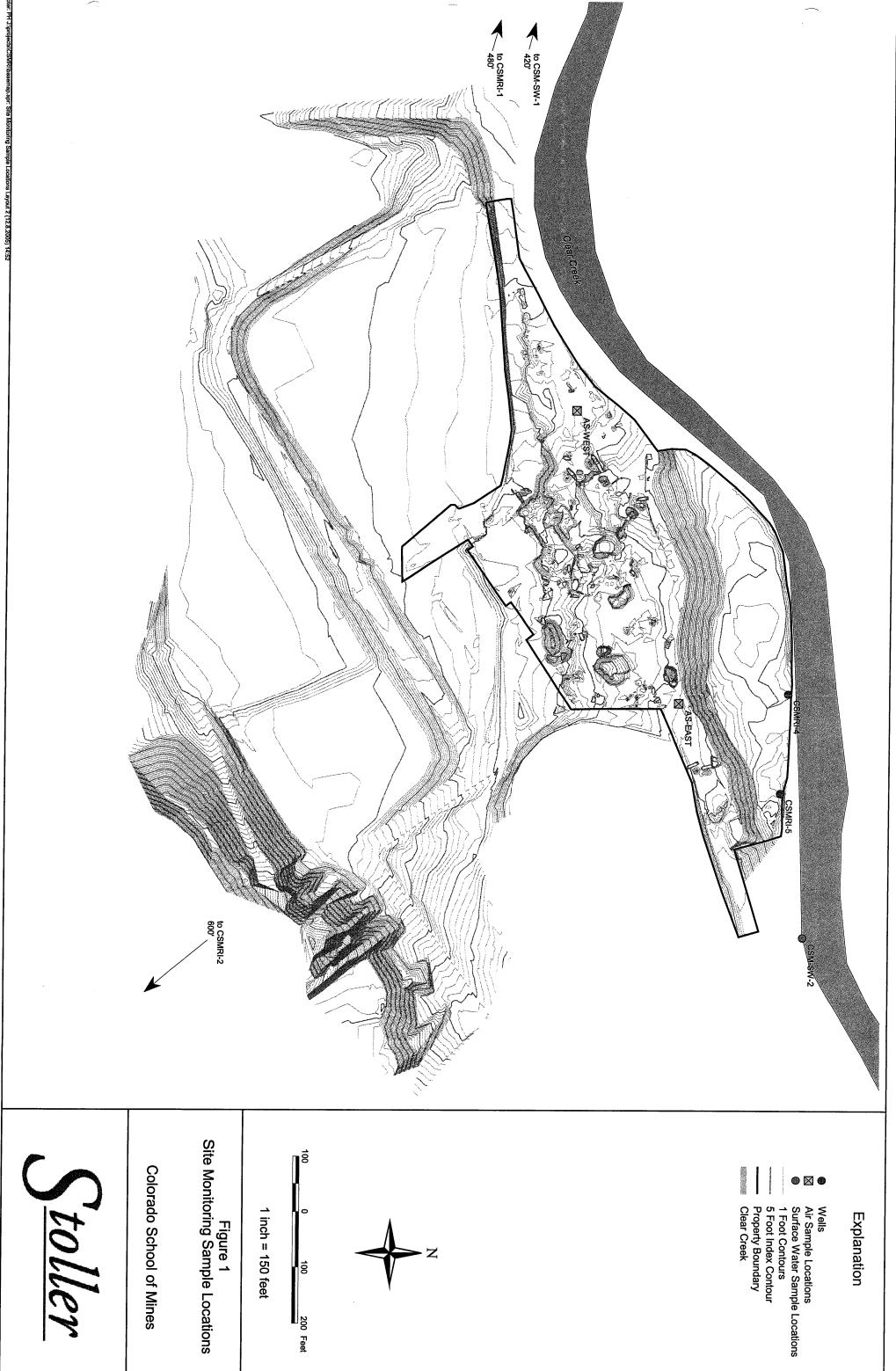
Historical Summary of Radioisotopes in Groundwater (Stoller)	U-235 U-238	0.01	0.012 0.43 0.011 0.217	0.114 0.85 0.053 0.43	0.014 0.94 0.073 0.46	0.01 0.6 0.05	0.026 0.68 0.025 0.299 0.89	0.049 0.65 0.050 0.31 0.94	0.024 0.83 0.002 0.35 1.06	0.013 9.7 0.53 8.2 24.7	0.005 11.4 0.49 10.6 31.4		0.012 11.5 0.61 11.4 34.3	0.034	0.011 1.51 0.086 1.2 3.57	0.051 1.85 0.051 1.47 4.4	0.01 1.45 0.066 1.21 3.63
of Radioisotopes i	Th-228 Th-230	+			-0.045 0.32	0.07 -0.02	0.14 0.003	0.162 0.108	0.108 0.285	0.019 -0.009	0.013 0.014	-0.013 0.164	0.033 0.311	0.009 0.007	-0.018 0.039	0.06 1.25	0.032 0.126
Historical Summary	Ra-226 Ra-228			0.1 0.63	-0.19 0.59	0.8 1.85	1.47 3.0	1.78 2.71	1.35 1.62	-0.03 0.16	0.26 0.34	0.17 0.78	0.13 0.1	1.06 0.53	2.51 0.44	2.50 0.76	1.97 0.52 Total Ra = 5
	Sample Sample Date			9/1/05	12/20/05	CSMRI-2 2/25/05	6/14/05	90/2/6	12/20/05	CSMRI-4 2/25/05	6/14/05	90/2/6	12/20/05	CSMRI-5 2/25/05	6/14/05	60/2/6	12/20/05

*Maximum Contaminant Level – National Primary Drinking Water Regulations
**5 CCR 1002-41 Reg 41 – Colorado Groundwater Standards
pCi/l - picocuries per liter
NE – Not Established
ug/l – micrograms per liter

Historical Summary of Metals in Groundwater (Stoller) (All results in milliorams ner liter) Table 2-9

					<i>(</i> *)	III Iesuu		(All results in milligrams per liter)	per m	er)						
Sample Station	Sample Date	Ag	As	Ba	Са	РЭ	ن	ВН	¥	Mg	o M	Na	Pb	Se	×	Zu
CSMRI-1	2/25/05	ND	ΩN	QN	28	QN	ΩN	QN	2.8	9.4	Q.	29	2	QN ON	Q	0.032
	6/14/05	Ð	Q	Ð	17	ND	ND	ND	2.3	5.1	Q.	16	2	Q.	Q	0.032
	9/1/05	ND	Q	0.055 (B)	21	ΩN	QN	QN	2.9	6.3	0.0021 (B)	25	9	0.0041 (B)	QN	0.034
	12/20/05	ND	ND	0.067 (B)	32	QN	S	0.000034 (B)	2.9	10	Q.	26	QN	ND	Ω	0.052
CSMRI-2	2/25/05	ND	ND	0.11	72	ΩN	Q	QN	7.1	32	Q	19	9	S	9	0.02
	6/14/05	ΩN	QN	0.1	92	ND	Ω	ND	6.3	32	QN	18	2	Q.	S	2
	9/7/05	Q.	Q.	0.11	81	ND	QN	ND	7.1	35	QN	19	Q	Q	Q	0.011 (B)
	12/20/05	ND	ΩN	0.098 (B)	76	ND	QN	0.000031 (B)	2.9	33	Q	18	Ð	Q.	Q	0.0043 (B)
CSMRI-4	2/25/05	2	S	ND	72	ND	ND	QN	5.1	31	0.017	29	2	9	Q	0.12
	6/14/05	2	9	Q	86	ND	ND	ND	9.9	34	0.038	34	2	0.0063	Ð	0.068
	9/7/05	ND	0.0035 (B)	0.055 (B)	82	QN	QN	QN	9.7	33	0.035	31	2	0.0049 (B)	Ð	0.097
	12/20/05	ND	ND	0.056 (B)	100	QN	QN	0.000045 (B)	6.8	43	0.024	34	2	QN	Q	0.18
CSMRI-5	2/25/05	Q	g	QN	54	ND	ΩN	ND	3.4	22	Q	27	2	₽ Q	Ð	0.067
	6/14/05	Ω	ND	QN	63	ND	QN	QN	3.3	23	QN	28	9	Ð	9	0.047
	9/7/05	ΩN	ND	0.085 (B)	85	ND	ΩN	QN	4.2	31	0.0042 (B)	35	9	0.0037 (B)	0.0018 (B)	0.089
	12/20/05	Ω	QN	0.072 (B)	79	0.00071 (B)	QN	0.000048 (B)	4.1	30	0.002 (B)	31	Q.	Ð	0.0012 (B)	0.17
Detection Limits	mits	0.01	0.01	0.1	-	0.005	0.01	0.0002	1	1	0.01	1	0.003	0.005	0.01	0.02
MCL*		NE	0.01	2	빙	0.005	0.1	0.002	Ä	N	Ä	٩	0.015	0.05	밀	빙

*Maximum Contaminant Level – National Primary Drinking Water Regulations
ND – non detect
NE – not established
(B) – Detected above Instrument Detection Level but below Reported Detection Level



Stoller

200 Feet

Mar-06 - ★- ·CSMRI-5 -- ◆ -- CSMRI-1 - - - CSMRI-4 Jan-06 Nov-05 Sep-05 Date Jul-05 May-05 Mar-05 Jan-05 0 7 4 က Ŋ 9 ∞ Depth TOC (ft)

Figure 2 Hydrographs CSMRI-1, CSMRI-5

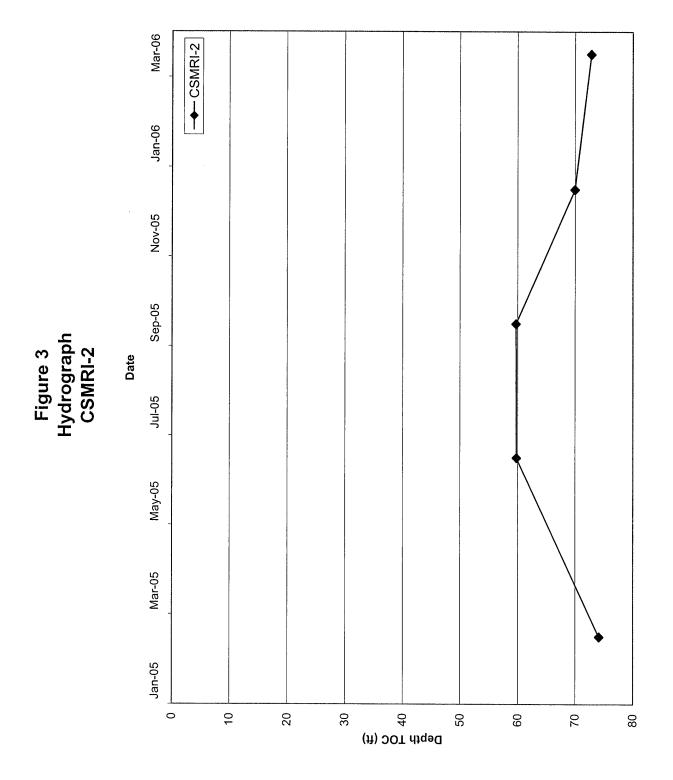
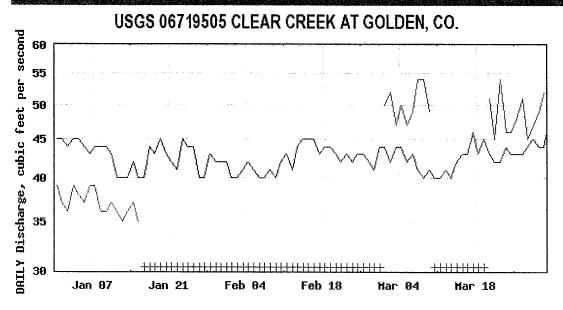


Figure 4
Clear Creek Gauging Graph

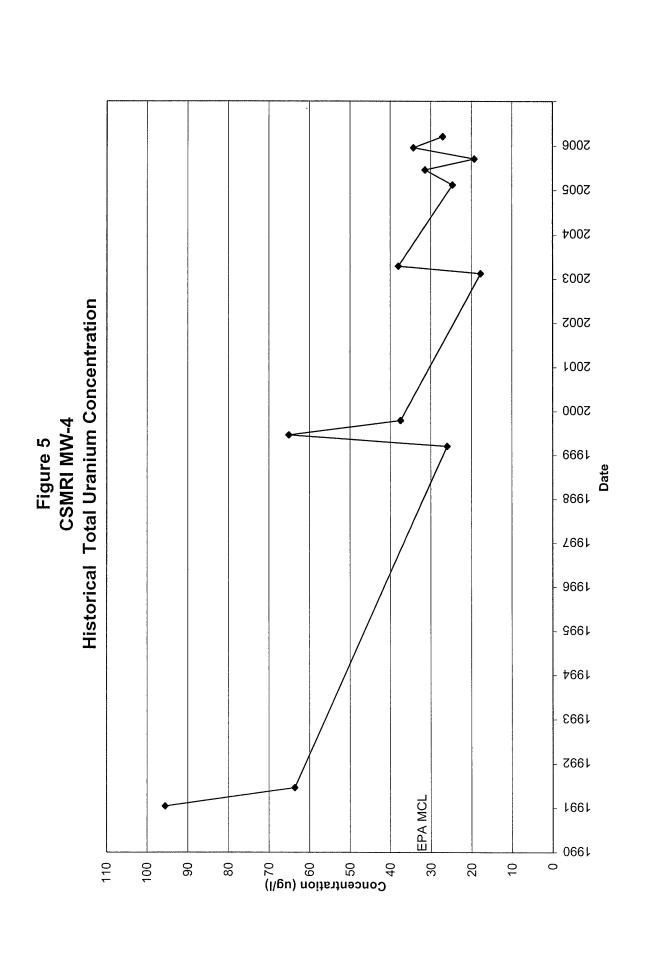


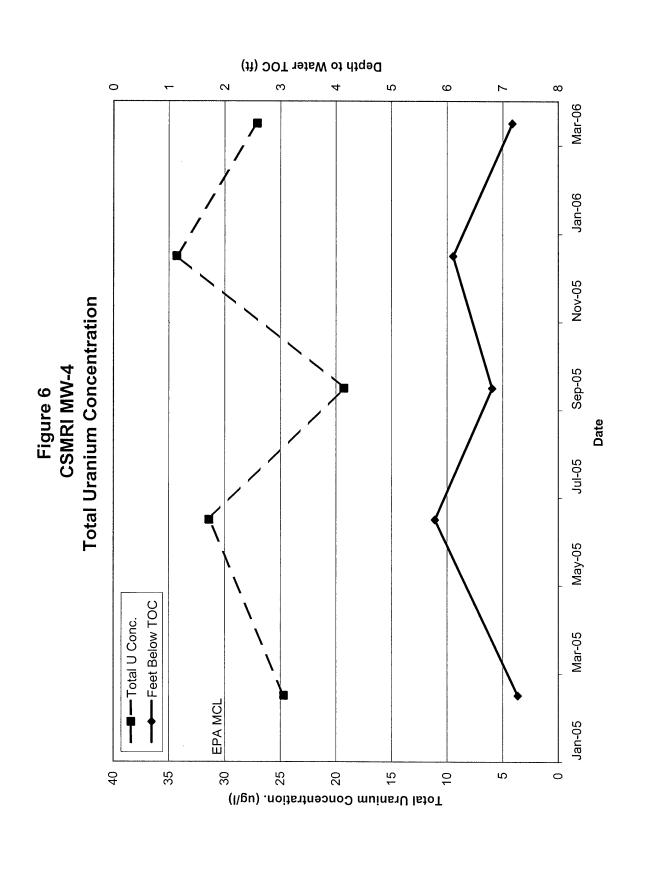


----- EXPLANATION ------MEDIAN DAILY STREAMFLOW BASED ON 31 YEARS OF RECORD

- DAILY MEAN DISCHARGE
- --- ESTIMATED STREAMFLOW
- + Flow at station affected by ice

Provisional Data Subject to Revision





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Appendix A Long-Lived Radioparticulate Survey Procedures

Long-Lived Airborne Radioparticulate Surveys

1.0 Introduction

1.1 Purpose

The purpose of this procedure is to provide instructions for taking breathing zone and general area air samples to determine airborne concentrations of long-lived particulate radionuclides. It also provides instructions on reviewing the results to determine if radiological posting is required.

1.2 Scope

This procedure addresses the requirements for monitoring airborne radioactivity. It includes monitoring methods, documentation, and result analysis. This procedure does not address use of continuous air monitors, how to establish radiological posting, or access control requirements.

1.3 Applicability

This procedure is applicable to monitoring for long-lived airborne radioparticulates. This procedure is not applicable to air sampling for determining radon or radon decay product concentrations, airborne tritium concentrations, or concentrations of non-radiological materials.

2.0 Precautions, Limitations, and Notes

2.1 Precautions

Handle samples with care to prevent cross-contamination.

Do not allow an air sampler to pick up debris from the floor, ground, or other surface.

Do not operate air samplers in explosive atmospheres or where there is >25% oxygen content.

Exhaust air samplers away from workers, contaminated surfaces, and open containers of radioactive (or other hazardous) material.

2.2 Limitations

This procedure only applies to radionuclides with half-lives of 405 days (1.11 years) or longer.

2.3 Definitions

High Volume Air Sampler – Air sampler capable of collecting greater than 3 ft³/min.

Low Volume Air Sampler – Air sampler capable of collecting greater than 10 L/min but less than 3 ft³/min.

Personal Air Sampler – Air sampler capable of being worn by personnel and measuring the wearer's breathing zone. These samplers are usually capable of collecting 10 L/min or less.

Breathing Zone – The general volume of air breathed by the worker(s). The breathing zone for a personal air sample is defined as the imaginary globe of a two-foot radius surrounding a person's head. The breathing zone of an area is the general volume of air to which occupants are expected to be exposed—typically at a height of 1 to 2 meters.

Annual Limit on Intake (ALI) – The derived limit for the amount of radioactive material taken into the body of an adult worker by inhalation or ingestion in a year. ALI is the smaller value of intake of a given radionuclide in a year by the reference man (ICRP Publication 23) that would result in a committed effective dose equivalent of 5 rems (0.05 sievert) or a committed dose equivalent of 50 rems (0.5 sievert) to any individual organ or tissue.



Derived Air Concentration (DAC) – For the radionuclides listed in Appendix A of 10 CFR 835, the airborne concentration that equals the ALI divided by the volume of air breathed by an average worker for a working year of 2,000 hours (assuming a breathing volume of 2,400 m³). For the radionuclides listed in Appendix C of 10 CFR 835, the air immersion DACs were calculated for a continuous, non-shielded exposure via immersion in a semi-infinite atmospheric cloud.

3.0 Prerequisite Actions

Verify air sampling equipment has been calibrated and has not exceeded the calibration due date.

4.0 Monitoring Requirements

4.1 General

- 1. Air sampling is required in occupied areas when, under typical conditions, an individual's intake is likely to exceed 2% of an ALI. For continuously occupied areas, this is 2% of a DAC, while 50% occupancy is 4% of a DAC, while <20% occupancy is 10% of a DAC. The Radiological Control Manager is responsible for determining the appropriate air sample location and frequency of collection.
- 2. Evaluate air sample results as quickly as practicable to evaluate the need for respiratory protection, area evacuation, worker intake, and worker relief from respirator use.
- 3. Air samples do not need to be counted any further when the activity is at or below the detection limits of the instrument counting the sample. For automated scalers with built-in algorithms, this value is calculated for each sample (e.g. Protean, Tennelec). For manual scaler systems such as the Ludlum 2000, Ludlum 2929, and E-600, this corresponds to the default detection limits, which are set at 5% of the applicable DAC.

4.2 Area Sampling

- 1. Use high volume air samplers (greater than 3 cubic feet per minute) to obtain sensitive and prompt determinations of "instantaneous" (short time duration) air concentrations.
- 2. Use low volume air samplers when monitoring over an extended time period (i.e., several hours).

4.3 Personal Monitoring

Use lapel air samplers for accurate breathing zone monitoring of personnel.

5.0 Sample Volumes and Collection Time Determination

- 1. Determine the altitude of the sampling location using the categories in Table 1.
 - a. <u>IF</u> the location is a major fixed facility,
 - THEN, the actual altitude should be used.
 - b. **IF** the altitude is not well known,
 - THEN, estimate it to the nearest thousand feet using a topographic map or equivalent.
 - c. Record the altitude of the sampling location on the Airborne Radioactivity Data Sheet.
 - NOTE: It is recognized that temperatures change during field operations, and that accurate temperature measurements may be difficult. Therefore, a simplified method has been adopted which uses descriptive categories of very cold (<10 °F), cold (10-35 °F), cool (35-55 °F), room temperature (55-80 °F), and hot (>80 °F).



- Determine the temperature of the sampling location using the categories in Table 1.
 Record the temperature at the sampling location on the Airborne Radioactivity Data Sheet.
- Select the appropriate pressure and temperature correction factor in Table 1.
 Record the selected pressure and temperature correction factor on the Airborne Radioactivity Data Sheet.

Table 1. Pressure (altitude) and Temperature Correction Factors

		Temperature	Range (°F)			**************************************
Facility	Altitude (ft)	<10	10 - 35	35 - 55	55 - 80	>80
		very cold	cold	cool	room temp	hot
	0	1.10	1.07	1.04	1.00	0.96
	1,000	1.08	1.05	1.02	0.98	0.95
	2,000	1.06	1.04	1.00	0.96	0.93
	3,000	1.04	1.02	0.98	0.95	0.91
Moab	4,000	1.02	1.00	0.96	0.93	0.90
Grand Jct.	4,565	1.01	0.99	0.95	0.92	0.89
· · · · · · · · · · · · · · · · · · ·	5,000	1.01	0.98	0.95	0.91	0.88
	6,000	0.99	0.96	0.93	0.89	0.86
MMSa	6,900	0.97	0.95	0.91	0.88	0.85
···	7,000	0.97	0.94	0.91	0.88	0.85
	8,000	0.95	0.93	0.89	0.86	0.83
	9,000	0.93	0.91	0.88	0.85	0.81
	10,000	0.91	0.89	0.86	0.83	0.80

^aMonticello Mill

- 4. Select the applicable DAC for the specified work locations or radionuclide type from Table 2.
 - a. <u>IF</u> the specific work location and radionuclide type are not specified in Table 2, <u>THEN</u> contact the health physicist to obtain the appropriate DAC.
 - b. Record the applicable DAC on the Airborne Radioactivity Data Sheet.
- 5. Select the sample volume (mL) from Table 2 (or from the graphs in Appendix A when the work location and radionuclide type are not specified in Table 2), corresponding to the counting instrument planned for use in counting the air sample.
- 6. Correct the selected sample volume for the altitude and temperature conditions at the sample location.

Divide the selected sample volume by the pressure and temperature correction factor obtained in step 5.0[3] to obtain the corrected total sample volume.

$$SV_C = \frac{SV_U}{PT_{CF}}$$

where SV_C = Corrected total sample volume (mL)

 SV_U = Uncorrected sample volume (from Table 2)

 PT_{CF} = Pressure and temperature correction factor (from Table 1).

8.3 x 10⁵

Not Available

Products and Mixed

Activation Productsd

Air Sample Volume (milliliters) DAC **Project Name or** Protean / Radionuclide (µCi/mL) Ludlum 2000 Ludlum 2929 E-600 Tennelec GJO^b 5 x 10-11 6.3 x 10⁵ 6.3 x 10⁵ 6.3×10^{5} Not Available **GJORAP**^b 5 x 10⁻¹¹ 6.3 x 10⁵ 6.3 x 10⁵ 6.3×10^{5} Not Available Moab 5 x 10-11 6.3 x 10⁵ 6.3 x 10⁵ 6.3 x 10⁵ Not Available Monticello^b 5 x 10⁻¹¹ 6.3 x 10⁵ 6.3 x 10⁵ 6.3 x 10⁵ Not Available UMTRA VPsb 5 x 10-11 6.3 x 10⁵ 6.3 x 10⁵ 6.3 x 10⁵ Not Available Uranium "yellowcake" 2 x 10⁻¹¹ 1.6×10^{6} 1.6 x 10⁶ 1.6 x 10⁶ Not Available **TRU**c 2 x 10⁻¹² 1.6×10^7 1.6×10^7 1.6×10^{7} Not Available Mixed Fission

Table 2. Minimum Flow Rates and Sampling Time Required to Achieve Minimum Sample Volumes^a

Not Applicable

1.7 x 10⁴

6.0 Long-Lived Radioparticulate Air Sampling

2 x 10-9

6.1 Preparation of Sampling Apparatus

- 1. **IF** the air sampler used is equipped with a programmable flow totalizer,
 - **THEN** set the flow totalizer to collect the corrected total volume.
- 2. Determine the necessary sample collection time at the flow rate of interest.
 - **NOTE:** If the time required to collect the corrected sample volume exceeds the expected work duration, contact the health physicist for guidance.
- 3. Disassemble the filter housing apparatus.
- 4. Inspect all sealing surfaces, gaskets, o-rings, and seals.

Replace any gaskets, o-rings, or seals, which show evidence of damage or deterioration.

NOTE: The Millipore RW 19, 47 mm filters are not identified as to which side is the flow side of the filter. The filters must be removed from the containers with the top of the filter being the side of the filter to be placed facing the atmosphere being sampled.

- 5. Place the filter over the support screen in the filter housing apparatus and install the retaining ring securely over the filter.
- 6. Inspect the assembled filter housing apparatus to ensure that the filter did not buckle or tear during installation and that it is securely seated in the housing to provide a leak-tight seal.
- 7. Place a clean cover over the filter housing face to protect the filter from physical damage and incidental contamination until ready for use.
- 8. Attach the filter housing to the air sampler.



^aSample volumes are "uncorrected values" based upon air sampler pump calibration at 70 °F and sea level altitude (29.92 inched of Hg.).

^bBased on the DAC for uranium mill tailings derived in Stoller Health and Safety Calculation.

^cBased upon Pu-239, Pu-240, or Pu-242 as the most restrictive radionuclide of this type likely to be encountered.

^dBased upon Sr-90 as the most restrictive radionuclide of this type likely to be encountered.

6.2 Collecting the Air Sample

1. Locate the air sampler on the person or in the area selected for the collection of the sample and in the breathing zone of the individual/occupants of the area being sampled.

NOTE: When conditions warrant the collection of a personal air sample, an area air sample is also required.

- 2. Remove the protective cover from the air sample filter apparatus.
- 3. Turn the air sampler "ON" and collect the desired sample volume.

Record the start time and date on the Airborne Radioactivity Data Sheet.

4. Turn the air sampler "OFF."

Record the stop time and date on the Airborne Radioactivity Data Sheet.

5. IF the air sample is collected to monitor an area rather than an individual,

THEN,

- a. Record the location where the air sample was collected on a Radiological Survey Map, or on the Airborne Radioactivity Data Sheet.
- b. Annotate the air sample filter ID number and time of collection in the remarks section of the Radiological Survey Map or on the Airborne Radioactivity Data Sheet.

6.3 Preparing the Sample Filter for Counting

- 1. Remove the sample filter media from the filter housing apparatus being careful to prevent damage and cross-contamination.
- 2. Place the filter in a clean filter envelope or sample container.
- 3. Label the envelope or sample container with a unique sample (filter) ID number.
- 4. Record the following data on the Airborne Radioactivity Data Sheet at a minimum.
 - a. Location, including: site, area, and specific location for area samples
 - b. Name and ID number if individual monitored for personal samples
 - c. RWP#, if applicable
 - d. Sample (filter) ID number
 - e. Air sampler type, model, and serial number
 - f. Name and signature of technician collecting the sample
 - g. Sampler flow rate (in mL/minute)
 - h. Pressure and Temperature correction factor
 - i. Sample time (in minutes)
 - j. Volume sampled (in mL)
 - k. Remarks or special conditions pertinent to the sample
- 5. Transport the filter media with the associated Airborne Radioactivity Data Sheet to the counting room for analysis.

7.0 Sample Analysis

7.1 Counting Samples With Short-Lived Radionuclides Present

NOTE: If at any time during the counting sequence of an area air sample from a posted Airborne Radioactivity Area, it is determined that occupancy is not necessary, only the count for the record need be performed (step 7.1[5]).

- 1. Count the sample and calculate activity concentration within 90 minutes.
 - a. IF the airborne concentration is <5% of the DAC,

THEN,

- 1. Do not post the area as an Airborne Radioactivity Area.
- 2. Proceed to step 7.1[6] of this procedure.
- b. IF the airborne concentration is <10% but >5% of the DAC,

THEN,

- 1. Do not post the area as an airborne radioactivity area.
- 2. Perform step 7.1[5] of this procedure.
- c. IF the airborne concentration is <400% but >10% of the DAC,

THEN,

- 1. Do not post the area as an airborne radioactivity area.
- 2. Perform step 7.1[2] of this procedure.
- d. IF the airborne concentration is >400% of the DAC,

THEN.

- 1. Notify the Radiological Control Manager and follow his/her instructions for follow-up sampling and posting of the area.
- 2. Perform step 7.1[2] of this procedure.

NOTE: If an area is posted as an Airborne Radioactivity Area, and follow up area air samples indicate airborne radioactivity concentrations to be < 10% of the DAC, further analysis of the initial air sample(s) need only be completed for count of record (step 7.1[5]).

- 2. Recount the sample and calculate activity concentration at least 6 hours after the first count or during the next work shift.
 - a. IF the airborne concentration is <5% of the DAC,

THEN,

- 1. Do not post the area as an Airborne Radioactivity Area.
- <u>IF</u> the area was previously posted as an Airborne Radioactivity Area,
 <u>THEN</u>, depost the area.
- 3. Proceed to step 7.1[6] of this procedure.



b. IF the airborne concentration is <10% but >5% of the DAC,

THEN,

- 1. Do not post the area as an airborne radioactivity area.
- <u>IF</u> the area was previously posted as an Airborne Radioactivity Area, <u>THEN</u>, depost the area.
- 3. Perform step 7.1[5] of this procedure.
- c. <u>IF</u> the airborne concentration is <100% but >10% of the DAC,

THEN,

- <u>IF</u> posting was not required by step [1] above,
 <u>THEN</u> do not post the area as an Airborne Radioactivity Area.
- 2. Perform step 7.1[3] of this procedure.
- d. **IF** the airborne concentration is >100% of the DAC,

THEN,

- 1. Post the area as an Airborne Radioactivity Area.
- 2. Perform step 7.1[4] of this procedure.
- 3. Notify the Radiological Control Manager.
- 3. Recount the sample and calculate activity concentration 72 hours after sample collection (or if more than 72 hours has elapsed, prior to allowing the area to be occupied).
 - a. **IF** the airborne concentration is <5% of the DAC,

THEN,

- 1. Do not post the area as an Airborne Radioactivity Area.
- <u>IF</u> the area was previously posted as an Airborne Radioactivity Area, <u>THEN</u>, depost the area.
- 3. Proceed to step 7.1[6] of this procedure.
- b. IF the airborne concentration is <10% but >5% of the DAC,

THEN,

- 1. Do not post the area as an Airborne Radioactivity Area.
- <u>IF</u> the area was previously posted as an Airborne Radioactivity Area, <u>THEN</u>, depost the area.
- 3. Proceed to step 7.1[5] of this procedure.
- c. IF the airborne concentration is <100% but >10% of the DAC,

THEN,

- <u>IF</u> posting was not required by step 7.1[1] or [2] above,
 <u>THEN</u> do not post the area as an Airborne Radioactivity Area.
- 2. Perform step 7.1[4] of this procedure.



d. <u>IF</u> the airborne concentration is >100% of the DAC,

THEN,

- 1. Post the area as an Airborne Radioactivity Area.
- 2. Perform step 7.1[4] of this procedure.
- 3. Notify the Radiological Control Manager.
- 4. Recount the sample and calculate activity concentration each shift worked.
 - a. <u>IF</u> the airborne concentration is <5% of the DAC,

THEN,

- 1. Do not post the area as an Airborne Radioactivity Area.
- <u>IF</u> the area was previously posted as an Airborne Radioactivity Area, <u>THEN</u>, depost the area.
- 3. Proceed to step 7.1[6] of this procedure.
- b. IF the airborne concentration is <10% but >5% of the DAC,

THEN,

- 1. Do not post the area as an Airborne Radioactivity Area.
- 2. <u>IF</u> the area was previously posted as an Airborne Radioactivity Area, <u>THEN</u>, depost the area.
- 3. Proceed to step 7.1[5] of this procedure.
- c. IF the airborne concentration is >10% of the DAC,

THEN,

- 1. Post the area as an airborne radioactivity area.
- 2. <u>IF</u> continued occupancy is required in the posted Airborne Radioactivity Area, <u>THEN</u> repeat step 7.1[4] of this procedure for each shift worked.
- 3. Perform step 7.1[5] of this procedure after 7 days from the time of sample collection.
- 5. Recount the sample ≥ 7 days after collection for record.
 - **IF** the airborne concentration is >5% of the DAC,
 - THEN, notify the Radiological Control Manager and Dosimetry.
- 6. Record sample results on the Airborne Radioactivity Data Sheet.
- 7. Sign and date the Airborne Radioactivity Data Sheet.

7.2 Counting Personal Samples

- 1. Count the sample and calculate activity concentration during the next work shift (but not sooner than 6 hours) after sample collection.
 - a. **IF** the airborne concentration is <5% of the DAC,
 - THEN perform step 7.2[4] of this procedure.

b. <u>IF</u> the airborne concentration is <100% but >5% of the DAC,

THEN perform step 7.2[3] of this procedure.

c. IF the airborne concentration is >10% of the DAC,

THEN,

- 1. Perform step 7.2[2] of this procedure.
- 2. Notify the Radiological Control Manager.
- 2. Recount the sample and calculate activity concentration 72 hours after sample collection.
 - a. IF the airborne concentration is <5% of the DAC,

<u>THEN</u>, perform step 7.2[4] of this procedure.

b. IF the airborne concentration is >5% of the DAC,

THEN, perform step 7.2[3] of this procedure.

3. Recount the sample >7 days after collection for record.

IF the airborne concentration is >5% of the DAC,

THEN, notify the Radiological Control Manager.

- 4. Record sample results on the Airborne Radioactivity Data Sheet.
- 5. Forward the completed Airborne Radioactivity Data Sheet and Radiological Survey Map, if used, for review and signature.

8.0 Records

8.1 Records Generated By This Procedure

Airborne Radioactivity Data Sheet

Radiological Survey Map

Chain of Sample Custody

8.2 Record Review

- 1. Review the completed sample documentation to ensure completeness, legibility, and reproducibility.
- 2. Compare the sample data with similar data to determine if trends are developing or unexpected results were obtained.
- 3. Notify the Radiological Control Manager of any trends or unexpected results.

8.3 Record Disposition

Maintain the documentation generated by this procedure in accordance with the project-specific QAPP.

9.0 References

Title 10, Code of Federal Regulations, Part 835, "Occupational Radiation Protection."

DOE 10 CFR 835 Implementation Guide, G-10 CFR 835/E2 - Rev. 1, "Workplace Air Monitoring."

Stoller Radiological Control Manual

Stoller Health and Safety Manual

Appendix B Groundwater Sampling Procedures

Groundwater Sampling

1.0 Purpose

This procedure describes actions to be used to sample groundwater from monitoring wells and piezometers. Monitoring wells are generally sampled on a semiannual, quarterly, or monthly basis, or by special request in support for specific projects. All wells are to be sampled using this procedure unless superseded by specific site, facility, or client procedures.

This procedure describes equipment decontamination and transport, site preparation, detection and sampling of immiscible layers, water level measurements, well purging, sample collection, field and analytical parameters, quality assurance/quality control (QA/QC) requirements, and documentation that shall be used for field data collection.

2.0 Scope

This document describes acceptable methods for the sampling of wells and piezometers.

3.0 Responsibilities and Qualifications

Personnel performing groundwater sampling procedures are required to have completed the initial 40-hour OSHA classroom training that meets the Department of Labor requirements at 29 CFR 1910.120(e)(3)(i), and must maintain a current training status by completing the appropriate annual 8-hour OSHA refresher courses. Personnel must also have read the appropriate project, site, or facility Health and Safety Plan(s). Prior to engaging in groundwater sampling activities, personnel must have a complete understanding of the procedures described within this procedure and, if necessary, will be given specific training regarding these procedures by other personnel experienced in the methods described within this procedure.

4.0 Groundwater Sampling Procedures

4.1 Introduction

Many monitoring wells are constructed of either 2-inch stainless steel, or 2- or 4-inch flush threaded PVC casing. Some piezometers are completed as monitoring wells, and they are usually constructed of ¾-inch inside diameter, flush threaded PVC casing. Some wells have been constructed to incorporate a sump below the well screen. Because these vary in length, the well construction diagrams should be consulted to determine the sump lengths for specific wells. Most piezometers are constructed with a flush threaded cap at the bottom of the well screen. However, the well construction diagrams should also be consulted for information about specific piezometers.

Procedures for groundwater sampling are designed to obtain a sample that is representative of the formation water beneath the site in question. Since an analysis of the quality of formation water is desired, standing water within the well must be purged before sampling. Also, a measure of the static water elevations is important to determine the effect of seasonal horizontal and vertical flow gradient changes during site characterization activities.

Groundwater sampling procedures can be initiated after sampling personnel take the required water level measurements and purge the well in accordance with this procedure. Methods for accomplishing each of these activities are included in this procedure in the following sequence:

- Collection of immiscible layers samples, if present
- Well purging
- Groundwater sampling using a bailer

- Groundwater sampling using a peristaltic pump
- Groundwater sampling with a bladder pump

4.2 General Equipment Requirements

Down-hole sampling equipment shall be constructed of inert material such as polytetrafluoroethylene (Teflon®) or stainless steel. This equipment shall be assessed on an individual basis prior to use in the field.

The following is a primary list of well sampling and associated equipment:

- Bailers Teflon[®], stainless steel, or other appropriate inert materials
- Teflon® coated stainless steel cable with reels
- Peristaltic pumps and tubing
- Water level measuring devices sufficiently accurate to measure water levels to the nearest 0.01 foot
- Graduated purge water containers
- Plastic sheeting
- Distilled or deionized water
- Decontamination equipment and supplies
- Organic vapor detector (OVD)
- Gloves (nitrile)
- Calculator and watch
- Sample containers precleaned to EPA specifications
- pH paper
- Custody tape
- Coolers with sufficient blue ice to cool samples to 4°C
- Preservatives (trace metals grade)
- Disposable in-line 0.45-micron membrane filters
- Logbooks and field forms
- Black waterproof pens
- Portable laboratory equipment for measuring field parameters for pH, temperature, specific conductance, and turbidity
- Total alkalinity reagent
- Beakers and graduated cylinders

Additional equipment may be required to meet project or client health and safety standards, to perform specialized sampling, or to meet personnel and equipment decontamination requirements.

4.3 Equipment Decontamination and Transport

Equipment associated with the tasks involved in groundwater sampling shall be decontaminated upon arrival at the sampling location. All sampling equipment shall be decontaminated between

sample locations. Decontamination frequency shall be increased appropriately as field conditions dictate.

Transportation of all equipment shall be performed in a manner that eliminates any possibility of cross-contamination. Calibration solutions, fuel, decontamination solutions and wastewater, and all other sources of contamination shall be segregated from sampling equipment during transport. Purge water being transported to holding areas shall be kept in closed containers.

If the decontamination of downhole equipment is not performed at the well, used downhole equipment shall be wrapped in plastic sheeting and/or segregated from clean equipment to eliminate the possibility of cross contamination. The equipment shall then be decontaminated as soon as possible.

4.3.1 Routine Field Decontamination

Decontamination of delicate equipment and the routine decontamination of sampling equipment prior to use at each well shall consist of the following steps:

- Vigorously scrub the equipment with a brush and solution of phosphate-free laboratory grade detergent (e.g., Liquinox) and distilled water.
- Rinse the equipment thoroughly with approved distilled water.
- If the decontaminated equipment is not immediately packaged to eliminate any adhesion of airborne impurities, perform an additional final rinse, or decontamination and rinse, immediately prior to actual sampling operations.

4.3.2 Routine Decontamination of Sampling Pumps

The external surfaces of all non-dedicated pumping equipment shall be decontaminated as described in Subsection 4.3.1. Internal surfaces shall be decontaminated according to the following procedures, except under special situations where the pump(s) must be disassembled and the internal parts cleaned separately (see Subsection 4.3.3). For routine decontamination, the following procedures shall be followed.

- Pump several pump volumes of a solution of a phosphate-free laboratory grade detergent (e.g., Liquinox) and water through the equipment.
- Displace the soap solution immediately by pumping approved distilled water, equivalent to three or more volumes of the pump storage capacity, through the equipment.
- If any detergent solution remains in the pump, continue pumping distilled water through the system until the detergent is no longer visibly present. Sudsing is the common indicator used to determine incomplete rinsing.

4.3.3 Unusual Decontamination Requirements

When equipment becomes grossly contaminated, such as from the collection of immiscible layer samples (see Subsection 4.5), routine decontamination of sampling equipment is not considered sufficient and thus is not allowed. This situation and other unusual equipment decontamination problems shall be reported to the field site supervisor. Under certain circumstances, a pump can be disassembled and the parts cleaned separately using approved solvents (i.e., hexane, alcohol, etc.). If specific instructions are required, the field site supervisor shall consult with a management representative for proper decontamination procedures.

4.3.4 Disposition of Decontamination Water

All water generated during the decontamination of equipment used for the sampling of wells shall be containerized in either a satellite container or in the purge water container in the groundwater sampling vehicle. It will then be disposed of according to the procedure designated in Subsection 4.6.3 of this procedure.

4.4 Site Preparation

Sheet plastic may be used to protect clean equipment from contacting contaminated surfaces. Plastic bags and sheeting, along with the segregation of clean and dirty equipment, can be used to reduce the chances of cross contamination. If a mechanical bailer retrieval system is used, the amount of plastic appropriate for protection of sampling equipment may be lessened. The sampling crew members are responsible for determining the amount of plastic sheeting required.

Disposable nitrile gloves, or gloves made of other approved materials, shall be used at all times when handling sampling equipment. Gloves shall be changed between each site and as often as necessary to ensure the integrity of clean sampling equipment.

4.5 Collection of Immiscible Layer Samples

When specified in the project sampling plan, or when the well to be sampled contains immiscible layers, immiscible phases must be collected before purging activities begin. The method of choice for collecting light non-aqueous phase liquids (LNAPLS) is a bottom valve bailer or peristaltic pump. Dense non-aqueous phase liquids (DNAPL) or "sinkers" shall be collected with a bottom double check valve bailer or peristaltic pump.

In all cases, the bailer shall be carefully lowered into the well so that agitation of the immiscible layer is minimal. Any bailer used to collect immiscible layers shall be dedicated to the well that is sampled. Peristaltic pumps shall be equipped entirely with silicon, or other chemical compatible tubing, when sampling immiscible layers. The project manager shall be responsible for determining the type materials to be used for specific projects. Dedicated equipment used for collecting immiscible layers shall be decontaminated prior to and after use as described in Subsection 4.3 of this procedure, if removed from the well.

Immiscible layer sampling shall be performed as follows.

- Remove dedicated bailers from the well and decontaminate as specified in Subsection 4.3 of this procedure. Decontaminate dedicated pump tubing, if used, prior to use.
- For LNAPLs, carefully lower the bailer intake or sampling port to the midpoint of the
 immiscible layer and allow it to fill while it is held at this level. The bailer must be
 lowered into the immiscible layer slowly so that minimal agitation of the immiscible
 layer occurs. Peristaltic pump intakes must also be lowered to the midpoint of the
 immiscible layer.
- If a DNAPL layer is being sampled, use either the double check valve bailer or peristaltic pump. Lower the bailer into the well until bottom is encountered. Lower peristaltic pump intakes also to the well bottom. Care must be taken not to immerse the pump intake into accumulated sediments.
- Do not allow the bailer or line to touch the ground at any time or allow the ground to come in contact with other physical objects that might introduce contaminants into the well.
- Decontaminate all equipment immediately after sampling is completed. Suspend dedicated bailers in the well from the well cap above the high water level. Discard silicon tubing used with peristaltic pumps.

4.6 Well Purging

Purging stagnant water from a well is required so that the collected sample is representative of the formation groundwater. The device used (bailer or pump) depends upon aquifer properties, individual well construction, and data quality objectives. Wells that contain immiscible layers will not be purged unless specified in the site-specific work plan. Any well scheduled for purging and sampling that subsequently is found to contain immiscible layers must be reported to the site supervisor or project manager. The project manager shall be notified immediately prior to continued activities.

Before obtaining water level elevations or initiating purge activities, obtain the following information in reference to the well to be sampled, and enter the applicable information on the sample collection log.

- Location code (well number)
- Previous purge volume (information only)
- Depth to top of screen (bailed wells only)
- Well sample number
- Report Identification Number (RIN)
- Sample event number

Record the location code (well number), date, sampling team members, visitors, well condition, and any other pertinent information on the sample collection log. Enter the well number, time well is opened, and other information regarding the field activities on the Field Activity Daily Log.

The field instruments shall be standardized (to check calibration) and the results recorded on the sample collection form.

Measure the depth to the top of the water column and the total depth of the well in order to determine the height of the water column in the well. Calculate the well casing volume using the well casing inner diameter and the height of the water column in the well. The formula for calculating the volume in gallons of water in the well casing is as follows:

```
(\pi r^2 h) 7.481 = gallons; where

\pi = 3.142

r = inside radius of the well pipe in feet

h = linear feet of water in well

7.481 = gallons per cubic foot of water

1 gallon = 3785 ml
```

Calculations of the volume of water in typical well casings may be done as follows:

```
a. 2" diameter well:
0.16 gal./ft x (linear ft of water) = gallons of water
b. 4" diameter well:
0.65 gal./ft x (linear ft of water) = gallons of water
c. 3/4" diameter well:
```

87 ml./ft x (linear ft of water) = milliliters of water

4.6.1 Purging Duration

Purging shall be considered complete if any of the following conditions are met.

- 1. Purging is complete if at least three casing volumes of water are removed from the well, and the last three consecutive pH, specific conductance, and temperature measurements do not deviate by more than the following: 1) pH = ±0.1 pH units; 2) Specific Conductance = ±10% and; 3) temperature ±0.5°C. A turbidity measurement will be taken for every other purge sample for wells that are purged using a bailer. For wells that are equipped with a dedicated bladder pump, the turbidity will be measured each time the parameters are taken. The purge rate should be such that the turbidity is maintained at 5 NTU units or less (if possible). If the readings are not stabilized after three volumes, continue purging until stabilization or until five volumes have been removed. Field parameter measurements shall be collected after every half-casing volume (approximate) is removed from the well. When casing volumes are less than 1-liter, parameter measurements will be collected after each whole casing volume is removed. If readings do not stabilize after five well volumes have been recovered, obtain additional guidance from the project manager concerning the proper course of action.
- 2. A well is considered dewatered when only a few milliliters of water (or none) can be recovered each time the bailer is lowered into the well. When this occurs, a 10-minute recharge rate will be calculated (linearly). If, at the end of the 10-minute period, the well has not recovered sufficiently to continue the purge in thirty minutes, the purge is considered completed. If, at the end of the 10-minute period, there is sufficient water to collect the VOA samples, the samples may be collected at that time. If the well has not recovered sufficient water during the 10 minutes, and depending upon the well history, the samplers may elect to return to the well the same day (preferably within two hours), check the water level, and collect the VOA samples (first), and other samples as feasible. If the sample team cannot return the same day, the well will be checked in 24 hours to determine if sample collection is feasible. If an extended period of time is required to collect samples, the procedures in Subsection 4.8.1 shall be followed. The well will not require an additional purge before sampling.

Wells that dewater (have a slow recharge rate as specified in 2 above) will not be restricted by parameter stabilization requirements. Sampling of these wells will follow the protocol established in Subsection 4.8.

4.6.2 Purging Methods

Wells will be purged by either bailing or pumping. When purging a well, the rate of water withdrawal during purging should not exceed the rate of withdrawal at which the well was developed (if known). All purge times (initiation and completion) and the rate of purging will be recorded on the field log sheets.

4.6.2.1 Bailing

Generalized procedures for purging a well with a bailer are as follows.

Prepare the sampling site as discussed in Subsection 4.4. Use properly
decontaminated equipment to determine the static water level of the well.
Measure the total depth of the well. Use this information to determine the
volume of water in the well casing.

- Decontaminate all dedicated bailers prior to initiating purging as described in Subsection 4.3 of this procedure.
- Use a mechanical reel equipped with Teflon® coated stainless steel cable attached to a bailer for bailing and sampling operations. Lower the bailer slowly into the well until water is encountered. Minimize agitation of the well water. Avoid lowering the bailer to the bottom of the well so sediments accumulated in the bottom do not become suspended. For wells that dewater, do not allow the bailer to strike the well bottom with force. Raise and lower the bailer carefully to limit surge energy and ensure that cable does not come in contact with any potentially contaminated surfaces. Do not allow the cable to drag along the well casing or against other objects that will cause fraying. Monitor the amount of water purged.

Wells with significant levels of contamination may have dedicated bailers installed. Dedicated bailer systems shall consist of a Teflon® bailer with check valve or double check valve for DNAPLS and a 5-foot leader of Teflon® coated stainless steel cable. Bailer sampling attachments and the stainless steel reel cable will not be dedicated to individual wells.

Dedicated bailers will be decontaminated at the conclusion of sampling activities and suspended from the well cap above the high water table. If the well interval above the high water table is not adequate to allow for storage in the casing, the dedicated bailers will be stored in labeled and sealed plastic bags at the equipment trailer.

4.6.2.2 **Pumping**

Pump designs that meet the following criteria are allowed for purging.

- The pump is constructed of a material that does not introduce a source of contamination to the well.
- The pump drive system does not introduce a source of contamination into the well.
- All downhole parts to the pump can be easily decontaminated.
- A return check system that does not allow pumped water to return to the well is integral in the pump design.
- The pump is easily used and does not require excessive amounts of time to install, use, remove, and decontaminate.

The pumps currently in use to purge groundwater include peristaltic pumps and dedicated submersible bladder pumps. A procedure for the use of each style of pump is specific to its applications. User manuals, which accompany each pump, shall be referenced for operating procedures.

Basic operating procedures common to all pumps are as follows.

- Prepare the sampling site as described in Subsection 4.4 regardless of the type of pump being used.
- Use properly decontaminated equipment to determine the static water level and the total depth of the well. This information is utilized to determine the volume of water in the well casing.

- For wells with dedicated pumps, calculate the minimum purge volume using the pump storage volume and the volume of the discharge tubing. A total depth of a 2-inch well cannot be taken without the removal of the pump.
- Position a dedicated pump near the bottom of the well or according to the
 information on the well construction form. Monitor the discharge rates and
 the amount of water purged during purging. The pumping rate for purging
 can be higher than the pumping rate for sampling, however, the water level
 in the well should be monitored during purging to avoid excessive water
 level drawdown.
- Ensure that any tubing that enters the well casing is composed of inert material. Disposable silicon tubing will be used in the drive mechanism of peristaltic pumps and discarded after each well is purged. The air supply for all air-driven pumps (dedicated bladder pumps) will be free of oil (i.e., no hydrocarbon containing substances will be added to the compressor).

4.6.3 Disposition of Purge Water

All water removed from a well during sampling operations shall be collected either in a satellite container or the purge water collection container in the groundwater sampling vehicle. The water from these containers will then be transferred to another approved collection container on the sampling or project site. When the collection container is filled, or is near capacity, it will be transported for disposition or treatment in accordance with approved project plans.

4.7 Measurement of Field Parameters

The following field parameters will be measured during groundwater purging operations unless otherwise specified by the project manager or the approved project work plans.

Parameter	Relative Precision	Minimum Calibration
рН	0.01 pH units	Daily
Conductivity	$10 \mu\mathrm{S/cm}$	Daily
Temperature	0.1 °C	Weekly
Total Alkalinity (unfiltered)	1 mg/l	None
Turbidity (photometric)	2 FTU (or NTU)	Specified purge samples (bailed wells) Daily (dedicated bladder pump wells)

The measuring equipment shall be stored and handled in a manner that will maintain the integrity of the equipment. Appropriate field manuals will accompany each instrument in the field. Each instrument will also be given an identification number. All logbook and field form references to individual instruments will refer to this number for ease of identification.

Field parameters will be measured at the following intervals.

 Conductivity, pH, temperature, and turbidity shall be measured from the first water removed from the well when initiating well purging procedures. For bailed wells, the initial bail of water will be carefully removed from the well and the water transferred to a sample beaker by decanting the bailer through a bottom control valve. For wells purged with a peristaltic pump, similarly collect the first water removed in a sample beaker and then measure parameters. For wells with dedicated pumps, measure the parameters of the first recovered water that is collected in the continuous sampler.

- During purging operations, conductivity, pH, and temperature shall be measured for every half-casing volume (one half of the initial casing volume as calculated on the sample collection log form) of water removed from the well (because of the accuracy of the graduated containers for the purge water, the purge volume will be estimated as close as feasible). For wells that have half volumes less than the volume of a sample bailer (approximately 1 liter), only measure parameters after each full casing volume of water is removed from the well. Turbidity will be measured on every other sample recovered for parameters for bailed wells, or wells purged with a peristaltic pump. All parameters, including turbidity, will be measured at predetermined intervals while purging wells with dedicated pumps.
- During purging, if a well is dewatered prior to the measurement of the final required set of parameters, then conductivity, pH, temperature, and turbidity shall be measured immediately before the start of sample collection. These parameters may be delayed until sampling is completed if, at the discretion of the sampling crew, the well recharge has provided insufficient water volume to collect all the samples and also measure parameters. If there is insufficient water for samples and field parameters, the parameters will not be measured.
- Total alkalinity measurements shall be collected only once upon completion of purging. For wells that do not dewater and sample collection proceeds to completion immediately after purging, alkalinity will be measured after the completion of all other final purge field parameters. Wells that dewater and require repeated visits for the collection of samples will have alkalinity measured subsequent to the collection of the sample for inorganic water chemistry. Alkalinity will not be measured if sufficient water is not available.
- For micro purged wells, a purge is considered completed when the parameters have stabilized.
- Whenever a method used to remove well water is changed, a set of field parameters shall be recorded from water removed with the new method.

4.8 Groundwater Sampling

Techniques used to withdraw groundwater samples from a well shall be based on consideration of the parameters of interest. The order of collection, collection techniques, choice of sample containers, preservatives, and equipment are all critical to ensuring that samples are not altered or contaminated. The preferred methods for collection of groundwater samples are either bailing and/or the use of bladder pumps.

Sites shall be prepared prior to sampling as described in Subsection 4.4. All necessary and appropriate information will be recorded on the sample collection log and on the Field Activity Daily Log.

4.8.1 Sample Collection

The following discussion involves collection of groundwater samples using bailers and peristaltic or bladder pumps. Regardless of the collection method, care shall be taken not to alter the chemical nature of the sample during the collection activity by agitating the sample or allowing prolonged contact with the atmosphere. To minimize the potential for

altering the sample and to maximize the available water, the following sample collection sequence is preferred.

- Radiation Screening
- VOC
- Nitrate/Nitrite, as N
- Dissolved Metals TAL, with Cs, Li, Sr, Sn, Mo, Si
- ^{239/240} Plutonium, ²⁴¹ Americium
- ^{233/234}U, ²³⁵U, ²³⁸U
- Gross alpha and beta
- ^{89/}Strontium
- ¹³⁷Cesium
- ^{226,228}Radium
- Tritium
- Total Metals TAL, with Cs, Li, Sr, Sn, Mo, Si
- TDS, CL, F, SO⁴, CO3, HCO³
- TSS
- BNA
- Pesticides/PCB
- Cyanide
- Orthophosphate

VOC samples shall be collected first and as soon as possible after the well has been purged. If a well is purged using a peristaltic pump, then all other samples shall be collected prior to removing the pump from the well. The VOC sample will then be collected using a bailer.

For wells that dewater, if a sufficient volume of water for VOC sample collection has still not accumulated within 48 hours after the completion of purging, VOCs will not be collected for that well. Other samples may be collected using a maximum of five attempts to recover sufficient sample water for analysis. This procedure is discussed in the following paragraph.

The containers used for sample collection from poor producing wells may differ from those used for high yield wells in some instances due to constraints on obtaining enough sample to fill sample containers. In some instances smaller containers may be utilized, or analyte samples normally collected in separate containers may be combined into a single container. Well histories can be used to identify which wells may require a modified sample suite and an extended sampling period. These wells will initially be sampled for a period of 48 hours after the completion of purging, with the exception of VOC sample collection, which is discussed in the previous paragraphs. The completion of purging will be considered 0 hour. At the end of 48 hours, any partial sample will be measured. The accumulated sample will be compared to the minimum volume requirement identified in Table 1 and the allowed sample holding time. If the minimum volume requirement for the target analyte has not been achieved, then sampling may continue as determined from the well recharge

history. All analyte samples that have only minimum sample volumes collected, and all uncollected samples will be documented on the sample collection log.

Table 1
Sample Containers and Preservatives for Groundwater Samples

Parameter	Minimum Container ¹	Preservative	Holding Time
Radiation Screen	120 ml poly	None	NA
VOC - CLP	3 – 40 ml amber glass	Cool to 4° C	4 Days
BNA	1 L amber glass	Cool to 4° C	7 Days
Pesticides/PCB	1 L amber glass	Cool to 4° C	7 Days
TSS	125 ml poly	Cool to 4° C	7 Days
TDS, CI, F, SO ₄ , CO ₃ , HCO ₃	1 L poly	Cool to 4° C	7 Days
Dissolved Metals - CLP, with Cs, Li, Sr, Sn, Mo, Si	1 L poly	*Filtered, HNO ₃ to pH <2, Cool to 4° C	6 Months
TOC	125 ml poly	H ₂ SO ₄ < pH2, Cool to 4° C	28 Days
COD	125 ml poly	H ₂ SO ₄ < pH2, Cool to 4° C	28 Days
Total Metals - CLP with Cs, Li, Sr, Sn, Mo, Si	1 L poly	Unfiltered, HNO₃ to pH <2, Cool to 4° C	6 Months
Orthophosphate	250 ml poly	Filtered, Cool to 4° C	2 Days
Nitrate / Nitrite as N	250 ml poly	H₂SO₄ to pH <2, Cool to 4° C	28 Days
Cyanide	1 L poly	NaOH to pH >12, Cool to 4° C	14 Days
Gross Alpha / Beta	550 ml poly	HNO₃ to pH <2	6 Months
233/2340, 2350, 2380	100 ml poly	Filtered, HNO₃ to pH <2	6 Months
^{239/240} Pu	1 L poly	HNO₃ to pH <2	6 Months
²⁴¹ Am	1 L poly	HNO₃ to pH <2	6 Months
89/90Sr	700 ml poly	Filtered, HNO₃ to pH <2	6 Months
^{226/228} Ra	750 ml poly	Filtered, HNO₃ to pH <2	6 Months
¹³⁷ Cs	2.5 L poly	Filtered, HNO₃ to pH <2	6 Months

¹ The volume listed is the minimum amount required for analysis. Actual sample volumes may be slightly higher and some parameters may be combined in a single container.

The order of sample collection may be changed at the discretion of the sampling team. Changes in the order shall be based on the predicted volume of water that will be recovered and the priority stated in the controlling document. The sampling team shall document their sample selections on the sample collection log.

Sample containers shall be stored away from sunlight and cooled to 4°C prior to filling. Immediately after collection, samples requiring cooling shall be cooled to 4°C. A chilled cooler shall be used as the storage container. Whenever a sample bottle that requires chilling is not being physically handled, it will be placed in the cooler to prevent heating or freezing, exposure to sunlight, and possible breakage.

VOC samples shall be collected using a bailer equipped with a bottom-decanting control valve or directly from the pump discharge line on wells equipped with bladder pumps. The procedures for collecting VOC samples are discussed in Subsections 4.8.1.1 and 4.8.1.2 of this procedure.



^{*} Some samples may not require filtering if taken from a well with a dedicated pump and turbidity of 5 NTU or less.

VOC vials shall never be filled and stored below capacity because of insufficient quantities of water in the well. Except for the VOC vials, adequate air space should be left in the sample bottles to allow for expansion.

Samples shall be placed in the appropriate containers and packed with ice in coolers as soon as practical. VOC samples will be stored in the cooler in an inverted position immediately after collection. When sampling is complete, the well cap shall be replaced and locked.

Sampling tools, instruments, and equipment shall be protected from sources of contamination before use and decontaminated after use as specified in Subsection 4.3. Liquids from decontamination operations will be handled in accordance with the procedures in Subsection 4.6.3 of this procedure. Sample containers shall also be protected from sources of contamination. Sampling personnel shall wear chemical-resistant gloves (e.g., nitrile) when handling samples, and the gloves will be disposed of between well sites.

4.8.1.1 Groundwater Sampling Using a Bailer

This subsection describes the use of a bailer for collecting groundwater samples that may be used to obtain physical, chemical, or radiological data.

A bailer attached to a Teflon® coated stainless steel cable is carefully lowered into the well. After filling within the well, the bailer is withdrawn by rewinding the bailer line, and the bailer contents are drained into the appropriate containers. Certain recommendations and/or constraints should be observed when using bailers for sampling groundwater monitoring wells, as follows.

- Use only bottom-filling Teflon® bailers or bailers made of other inert materials.
- Ensure that bailers are attached to a Teflon® coated stainless steel line that is pre-wound on a reel.
- Do not use bailers constructed with adhesive joints.
- Lower the bailer slowly to the interval from which the sample is to be collected.

VOC samples shall be collected using a bailer equipped with a bottom-decanting control valve. The first water through the valve assembly will be discarded into the purge water container. Vials will be filled by dispensing water through the control valve along the inside edge of the slightly tilted sample vial. Care shall be taken to eliminate aeration of the sample water. The vials will be filled beyond capacity so the resulting meniscus will produce an airtight seal when capped. The capped vial will be checked for trapped air by lightly tapping the vial in an inverted position. If air becomes trapped in the vial, the sample water shall be discarded, and the vial refilled. If two consecutive attempts to fill a VOC vial result in trapped air bubbles, the vial shall be discarded.

The remainder of the sampling water shall be collected in a stainless steel container from which the remaining sample bottles will be filled. Samples requiring filtration shall be filtered and then containerized.

4.8.1.2 Groundwater Sampling Using a Peristaltic Pump

Use of peristaltic pumps shall generally be limited to collecting sample aliquots for radionuclides, metals, and other species that are not subject to volatilization and degassing. Peristaltic pumps shall never be used to collect VOCs or other

volatile species in routine wells, although such samples may be collected for special screening applications. All downhole tubing shall be Teflon® except in areas of special concern (e.g., where immiscible layers exist) where special tubing, such as stainless steel or Viton®, may be required. If so, the project manager will make this determination. Only the portion of tubing that is inserted into the mechanical drive shall be made of silicon. This drive portion of the tubing shall be discarded after each use.

4.8.1.3 Groundwater Sampling Using a Downhole Bladder Pump

Some wells are equipped with dedicated downhole bladder pumps for purging and sampling. These are wells that will normally produce an adequate amount of water during a single visit to complete the required sampling suite. The equipment required to purge and sample a well consists of a pump control unit, a portable air compressor, a continuous sampler for measuring the field parameters, and the necessary sample containers, graduated cylinders, and container(s) to collect the purge and excess water. The following precautions should be observed during the sampling operation.

- Locate the compressor used to power the pump downwind from the well to eliminate the contamination of equipment and samples with exhaust.
- If the flow-through cell will not maintain a full sample chamber (tends to drain back), then clean the check valve on the pump if it is fouled, or replace the pump.
- Calculate the minimum purge volume using the procedure in Section 4.6.
 Note that a purge is considered completed only when the groundwater parameters have stabilized.
- Upon completion of purging, initiate sampling with the collection of the VOC sample(s). The pump should operate with minimum interruptions while the full sample suite is collected. Allowing the pump to stop for an extended period of time will cause the water trapped in the discharge lines to equilibrate to ambient temperatures, which is not acceptable. During sampling, the pump can be slowed to any rate that allows efficient sampling while also maintaining stable field parameters.
- Measure groundwater parameters periodically during sample collection and record them on the sample collection log to document conditions during sampling.
- Because micropurging is the method used for sampling, adjust the flow rate to limit the drawdown in the well. Also adjust the rate such that the turbidity is below 5 NTU for sampling. If this criterion is met, the samples need not be filtered.
- Operate the pump, pump control unit, and the flow-through cell according to the manufacturer's recommendations.

4.8.1.4 Groundwater Sampling Using a Push Type Sampler

This portion of this procedure describes the use of a Geoprobe[®] Screen Point 15 Groundwater Sampler, or similar type equipment, for collecting groundwater samples at predetermined depths. These samples may be used to obtain physical, chemical, or radiological analyses.

A Geoprobe® Screen Point 15 Groundwater Sampler, or equivalent tool, is driven to a predetermined depth by a push type-sampling rig. The Screen Point 15 Groundwater Sampler is equipped with a 41-inch retractable screen and expendable drive point. It can then be partially or fully withdrawn (up to 41 inches) to expose a portion or the entire deployed well screen. After groundwater enters the exposed screen, a sample is collected using either the procedures in Subsection 4.8.1.1, Groundwater Sampling Using a Bailer, or in Section 4.8.1.2, Groundwater Sampling Using a Peristaltic Pump. Note that these samples are collected only for screening purposes because the sampling tool hole has not been completed as a well.

The method for obtaining QC samples using the push type-sampling tool is provided in Subsection 4.8.4.1 for groundwater sampling. Duplicate groundwater samples shall be collected only if there is enough water to collect two full suites of analytes without dewatering the annulus. If insufficient water is available for the collection of a planned QC sample, it shall be explained and documented in the field log book, and the project manager informed. If insufficient water is available for two full suites of analytes, it may be come necessary to prioritize the analyte list. The prioritization sequence should be described in the project-specific work plan.

4.8.2 Sample Filtering and Preservation

Samples for dissolved metals, Gross Alpha/Beta, ^{233/234}Uranium, ²³⁵Uranium, ²³⁸Uranium, ^{89/90}Strontium, ¹³⁷Cesium, ²²⁶Radium, ²²⁸Radium, and orthophosphate shall be filtered in the field at the well location during the sampling event through a disposable 0.45-micrometer membrane filter. If a peristaltic or bladder pump is used, a disposable filter may be attached directly to the sample delivery line so that the sample is filtered directly into the sample container as it exits the delivery line. Discharge pressure shall be gauged so it does not exceed 50 psi. Alternatively, sample water may be collected in a stainless steel container and filtered with a peristaltic pump. Before sample collection, 100 to 200 milliliters of sample water shall be passed through the filter in order to rinse the filter and filtration apparatus of possible contaminating substances.

Preservatives shall be added to the sample bottles prior to the introduction of the filtered sample water. The preservative shall be added in aliquots appropriate to the size of the bottle.

After sample collection has been completed, the pH of preserved samples shall be checked as follows.

- Pour a small amount of sample from the sample bottle directly onto approved pH paper. Use care so that the threaded neck of the bottle does not contact the pH paper. Do not, under any circumstances, insert the pH paper into the sample bottle.
- Check the pH paper against the supplied color chart. If the appropriate pH has not been achieved, add additional preservative to the sample in 5 ml aliquots and repeat the pH test after each addition.

4.8.3 QA/QC Samples

The frequency and types of field QA/QC samples collected during groundwater sampling are described in project-specific work plans or quality assurance plan documents. These documents detail the applicable criteria for collecting QA/QC samples.

4.8.3.1 Duplicates

Duplicate samples shall be collected only from wells that produce enough water to collect two full suites of analytes without dewatering. Wells that produce sufficient water shall be incorporated into the sampling program such that the required duplicate frequency can be maintained.

Wells scheduled for duplicate sample collection shall be sampled as described in Subsection 4.8 of this procedure, and in relevant sections of project-specific work plans and/or quality assurance documents. Field duplicates are collected following the same sampling procedures used to obtain the real samples. With the exception of VOCs, the typical procedure for a location is to collect the real and duplicate of each sample at the same time, in two equal portions, with each portion going to the laboratory in separate containers. This is accomplished by alternately filling two sample bottles one half at a time to minimize heterogeneity. Note that real and duplicate VOC samples shall be collected independently to reduce the possibility of volatilization of the sample.

When a well with a dedicated pump is being used for sample collection, all samples shall be collected in the normal order, with duplicate VOC samples being collected first. The remaining samples will be sampled as described above.

If a well is being used for matrix spike (MS) and matrix spike duplicate (MSD) samples, the duplicate shall be collected after collection of the MS and MSD.

All duplicate samples shall be given a sample number different from the original sample and the information recorded on the sample collection log and/or the field QC sample collection log.

4.8.3.2 Matrix Spike and Matrix Spike Duplicate

MS and MSD samples shall be collected only from wells that produce enough water to collect the required suites of analytes without dewatering. MS and MSD samples are not collected on a routine basis, but will be collected if so designated in a site-specific sampling plans, or if requested by the project manager.

MS and MSD samples shall be collected as follows.

- Purge the well as described in Subsection 4.6 of this procedure..
- After completion of purging, collect VOC samples. Collect the real sample followed by the MS and MSD. Collect these samples in immediate succession.
- Collect the remaining samples not requiring filtering. For each sample parameter, collect the original sample, MS, and MSD concurrently. Fill the original sample bottle one-third full followed by the MS and MSD sample bottles, which are also filled one-third full. Rotate each bottle in the sequence, filling in one-third full until all three bottles are full. For analytes not requiring an MSD, collect only the original sample and the MS.
- After the real sample, MS, and MSD (where appropriate) are collected for one parameter, repeat the process for the next parameter.
- Similarly, collect samples requiring filtering. When a bailer is used, fill a
 stainless steel bucket with sample water. As samples are collected and the
 reservoir of water in the bucket is depleted, add more water with discretion.
 When a pump is used, attach the filter directly to the discharge line. Fill

sample bottles as described above, partially filling the original sample, MS, and MSD in rotating sequence until each parameter bottle is full.

- Radiochemistry samples may have more than one bottle for each parameter group. In this case, include all required bottles in the rotating sequence.
- Field parameter measurements are not be required for MS and MSD samples.
- Retain the original sample number for MS and MSD samples. However, add a suffix of MS or MSD to the sample number to correspond with each QA/QC sample. Record all information on the field QC groundwater sample collection log.

4.8.3.3 Replicates and Splits

Replicate and split samples shall be collected in the same manner as described for the MS and MSD. Seek instruction from the project manager for replicates and splits exceeding three samples. Record all information will be recorded on the groundwater sample collection logs.

4.8.3.4 Field Equipment Rinses

Wells scheduled for equipment rinsate samples shall be sampled as described in Subsection 4.8 of this procedure, and field equipment rinses shall be collected as described in this Subsection and in relevant portions of project-specific QC documents and work plans. Field equipment rinses shall be collected in a manner designed to reflect sampling techniques. All equipment used during sampling will be fully decontaminated as described in Subsection 4.3, then rinsed with distilled or deionized water. The rinse water will then be collected in bottles identical to those used for the original sample, and assigned a separate sample number. Analytes requiring filtration will be filtered using a new filter and tubing as required for the real sample. All information will be recorded on groundwater sample collection logs.

4.8.3.4.1 Bailed Wells

After completion of sampling, all equipment shall be decontaminated. Prior to leaving the well location, the equipment rinse will then be collected as follows.

- Fill the bailer with distilled or deionized water by pouring the water into the top opening.
- Decant the rinse water to the VOC vials through the bottom valve just as was done during sample collection.
- For the remaining unfiltered samples, fill the bailer with distilled or deionized water each time additional rinsate is needed.
 Transfer the rinsate to sample bottles or to a stainless steel bucket and then to sample containers in the same manner used during collection.
- Collect filtered samples in an identical manner as the real samples. Fill the bailer with distilled or deionized water. Then transfer the rinse water to a stainless steel bucket. Filter the rinse water in the bucket through a new disposable filter.

• Preserve rinse samples in the same manner as the real samples.

4.8.3.4.2 Pumped Wells

Rinsate samples are not routinely collected from wells that are equipped with dedicated bladder pumps because the samples from these wells are collected directly from the pump discharge line. However, wells sampled using peristaltic pumps for sampling may be selected for rinsate sampling, with equipment used in sample collection (down hole tubing, filter tubing and the stainless steel bucket used for sample water collection, etc.) being decontaminated prior to rinsate sampling. The tubing at the pump head will be replaced, and a new filter used for filtered analytes. To collect the samples, distilled or deionized water will be poured into the decontaminated stainless steel bucket and pumped, using the decontaminated tubing, into the sample containers. The equipment used to collect the real VOC samples will also be decontaminated, rinsed, and used to collect the VOC rinse samples. All samples will be preserved at the same pH levels as the real samples.

4.8.3.5 Distilled Water Blanks

Distilled water sample blanks are not submitted on a routine basis, but will be made up if so designated in a site-specific sampling plan. Samples of the distilled or deionized water used for the final decontamination of equipment will be transferred directly to sample bottles to determine any baseline contamination the water may have introduced into the samples. Five-gallon bottles of the distilled or deionized water will be opened in a controlled area, such as the bottle storage room, and then poured directly into the appropriate sample bottle. A Teflon®, glass, or stainless steel funnel may be used to help control flows into small mouth bottles. Blank samples will be preserved to the appropriate pH required for each analyte. All information will be recorded on groundwater sample collection logs.

4.9 Sample Handling and Control

Pre-cleaned sample containers will be obtained from a contract analytical sample container source. Preserving solution will be added to the bottles by a laboratory, the sample manager or qualified sampling personnel. The bottles will be labeled to indicate the preservative added.

The sampling containers, preservation requirements, and holding times for the various types of analyses are shown in Table 1. Groundwater samples will be properly labeled so that they can be easily identified. The sample numbering system will be assigned by project-specific sampling plan documents. A sample identification (ID) number will be assigned to each sample suite. The sample ID number will contain the following information as part of a nine to twelve character, alpha-numeric code:

Character(s)	Description	Code
1 and 2	Project ID	GW
3 through 7	Sample Number	00001 to 99999
8 and 9	Subcontractor ID	Alpha (e.g. TE = Tierra Environmental Consultants)
10, 11, and 12	QA/QC	MS for matrix spike, MSD for matrix spike duplicate

In addition to a sample number, each well sampled will be assigned a current Record Identification Number (RIN), an event number (specific to the RIN), and bottle numbers that are specific to the RIN and event number.

5.0 Records

All field activities shall be recorded on a Field Activity Daily Log or Groundwater Sample Collection Log. Additional logs may be required to record QC samples and for recording well status. Refer to specific project, site, or facility work plans for further information. Summary information of the day's activities or other pertinent information should always be recorded on the field forms. Under some circumstances, the project manager may assign a bound field logbook to the field personnel that will remain in their custody during all sampling activities. The cover of each logbook shall contain the following information at a minimum:

- Name of the organization to which the book is assigned
- Book number
- Project name
- Start and end dates

Logbook pages shall be sequentially numbered and marked with the book number before any data are recorded. All data and information pertinent to field sampling shall be recorded in the logbook or on the field forms that identify all required data entries. Enough detail must be included in the documentation to reconstruct the sampling event. Field form entries shall include the following minimum information:

- Date and time
- Names of field personnel
- Names of all visitors
- Location of field activities
- Description of sampling sites including weather conditions
- · All field observations and comments
- Field parameters
- Sample identification information
- References to all prepared field activity forms and chain-of-custody records

Field logbooks, when required on specific projects, shall normally be kept only by the field sampling team leaders and the site supervisor and shall typically be used only to summarize field activities and to document project information not required by the procedure field forms.

Permanent ink shall be used for all entries in the logbooks and on the field forms. Mistakes shall be crossed out with a single line, initialed, and dated. Unused pages or partial pages shall be voided by drawing a line through the blank sections and initialing and dating the mark. Any deviation from this procedure shall require documentation in the site supervisor's logbook.

The field activity daily log narrative should create a chronological record of the sampling team's activities, including the time and location of each activity. Descriptions of problems encountered, personnel contacted, deviations from the procedure, and visitors on site shall also be included. The weather conditions, date, signature of the person responsible for entries, and the number of field activity daily log sheets used to record media team activities for a given day shall also be included.

The Groundwater Levels Measurement/Calculations Form and the Chain of Custody Record (see *Containing, Preserving, Handling, and Shipping Soil and Water Samples*) shall also be completed for each site. All blank fields on the forms must be completed or voided.

6.0 References

- Environmental Protection Agency, 1982, Test Methods for Evaluating Solid Waste, SW-846, Volume II. Field Methods, 2nd edition.
- Environmental Protection Agency, 1986a, Engineering Support Branch Standard Operating Procedures and Quality Assurance Manual, EPA Region IV Environmental Service Division.
- Environmental Protection Agency, September 1986b, RCRA Ground Water Monitoring Technical Enforcement Guidance Document, OSWER-9950.1.
- Environmental Protection Agency, 1987a, A Compendium of Superfund Field Operations Methods, EPA/540/P-87/001. 1987.
- Environmental Protection Agency, 1987b, Data Quality Objectives for Remedial Activities, Development Process, EPA/540/G-87/003.
- Environmental Protection Agency, December 1988, User's Guide to the Contract Laboratory Program.

APPENDIX A

STANDARD GROUNDWATER FORMS



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Appendix C Sample Collection Forms

3/21/06

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1615 arrive @ CSMRI

cir samplers OK

site looks fine

1625 leave site

1655 back at harger

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3/29/06

6715 keve borse ones arrive O CSMRI eir samples running ok site looks normal 0755 leave site 0830 arrive O Broomfield harger

				(303) 546-43					
Sample	Collection	Log							
Project N	ame:				Sample lo	cation:			
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1316	2.90	3,78	6.81	356	211	187.9	1		
1320	4,35	3.87	6,52	401	239	18-1.9	1	same	
1323	5.50	3.50	6.97	399	230	176.0	\		
1326	7.25	3,83	6.98	407	225	188.9	man		
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10/7	1.80	14.06	7,30	572	410	141,3		brown
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1034	5.40	13,73	7,33	582	765	134.0	4.2	5 rom
	7.20						11/2	brown
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	Collection	Log							
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		50-510	,		Date:	, ,			
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			(34)	Lab. Per	igan - F	ert Collin	rs.		
urge Voli	imes and F	ield Water C	Quality Mea	Surements			· · · · · · · · · · · · · · · · · · ·		
Time	Volume	Temp	ρΉ	Conductivity	Totaletata			,	
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1444	Initial	6.16	6.45		(NTU)	(mV)	(mg/L)		
1446	.83	5.84	6.75	819	12.3	251,2	-1	chor	
1449	1.66	5.71	6.59	838	25.3	219.4			
1452	2.49	5.64	6.97	359	35.4	202,5		4	
1454	3.32	5.66	7,01	857	70.1	189.3		cloudy	
1456	4.15	5.86	7.04	850	606	179,9			
1500	4.98	6,10	7.08	862	37.0	177.4	win		
****			.,,,,,	863	70.3	135.2	5.7	42	
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lume pur	ged:			Alkalinity				men	
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		Sample location:	
Colorado School of More ject Number:	3	CSMRI-5	
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onle Type:		3/15/06	
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nple Type: GW SW Duplicate Other	Rinse	Sampler: NICK Malezyk	

Purge Volume Calcul	ations			Sample Co	llection			
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Total Depth =	(+.20)	11.25	– (ft)	Dissolved Metals	soonl Poly	HV3/	3/15/06	1555
Depth to Water =		6.58	(ft)	Roudina	1 Gal	HN03/	3/15/06	
Initial Water Column =		4.67	(ft)	Uramum	CWX	Files	3713/06	1610
nitial Water Volume =		0.75	(gal)					
3X Water Volume =		2.25	(gal)	lab. 12		rt Collin		ren

Purge Volu	mes and Fi	eld Water C						
rine	(gal)	Temp (°C)	pH (SU)	Conductivity		ORP	DO	Appearance
1541	Initial	8.24	6.64	(uS/cm)	(NTU)	(mV)	(mg/L)	
1544	0,75	7,99	6.55	695	4.5	190.1	1-	clear
1545	1,50	8,00	6.94	703		172,8		brown
1547	2.25	7.62	7,04	703		161.3	New	
				753	MA	152.9	712	+
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volume purç	-	25 gal	1	Alkalinity pH = s , c	09	Over range		nen
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Comments: used Dr. 2011 C. (1) f
Comments: used DR 20W spectrophotometer for DO, well purged + sampled whosher. Turbolity meter bettery does after first reading
subsequent readings probably would have been 100+ NTH'S
fre protesty world have been 100 + NTM 5
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Sample (Collection L	.0a	**					
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	olo Sch	m/st	Money		Sample lo			
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3X Water V	olumo =		men					wen
ox water v	olume –		(gal)	Lab: Pur	igan - Fr	ert Collin	rs	· · · · · · · · · · · · · · · · · · ·
Purge Volu	ımes and Fi	eld Water C	Juality Moad					
Time	Volume	Temp	pH	Conductivity	T		******	
	(gal)	(°C)	(SU)	(uS/cm)	Turbidity (NTU)	ORP	DO	Appearance
1231	Initial	2.61	6.30	487	6.2	(mV)	(mg/L)	/
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-]						
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'olume pur	ged:		,	Alkalinity			— <u> </u>	- min
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				(000) 040-43	00						
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Project N	umber:		117003	·····	Date:						
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					1 //1	2 x / / / / /	czyk				
	lume Calcul	ations		Sample Co	ollection						
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Initial Mate	- \ / - l		nen								
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3X Water V	olumo –		nin					mn			
- Corator V	oldine –		(gal)	Lab: Par	igan - Fe	rt Collin	13				
Purae Volu	imes and Fi	old Water C	No 124 1.4								
Time	Volume										
	(gal)	Temp (°C)	pΗ	Conductivity	Turbidity	ORP	DO	Appearance			
1144	Initial	3.45	(SU)	(uS/cm)	(NTU)	(mV)	(mg/L)				
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olume pur	ged;		,	Alkalinity							
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Sample C	Collection L	00									
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iiililai vvalei	volume =		(gal)								
3X Water Vo	nlume =		ven (==)	l abi				mn			
or trator to	olume –		(gai)	Lab: Paragan - Fort Collins							
Purge Volu	mes and Fi	eld Water C	Juality Moas	curomonto			···-				
Time	Volume	Temp	рН	Conductivity	T						
	(gal)	(°C)	(SU)	(uS/cm)	Turbidity	ORP	DO	Appearance			
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√olume pur	gea:		i i	Alkalinity							
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Colorado School of Mines RESEARCH INSTITUTE CREEKSIDE SITE

DATE:	3/15/06	······································	
SHEET	/	OF	1

FIELD ACTIVITY DAILY LOG

PROJECT NO. 4060 - 500

RFETS PROJECT:		1100E01110. 4000 - 570
TYPE OF FIELD ACTIVITY:		
TYPE OF FIELD ACTIVITY: らい s EQUIPMENT USED: Air Monitoring Ins DESCRIPTION OF DAILY ACTIVITIES	empling sazo10 Spectrop	Lotemeter: 000800019197
DECORPTION OF DAILY A STRUCTURE	:: Water Level Ind.:_12329	Field Parameter Kit:YSI Kit No.: -
- TON OF BAILT ACTIVITIES	AND EVENTS:	
0715 arrive o hanger, pre	pone paperwork, gather sun	lies
OSIS (all brate instrument)	•	
turbodity meter # 91027	17 0.02 -70.02 100.0 -71	mn /
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semple 5W 0 1235, 1	250 - Rale	
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WD 7.17/		
sample Metals 1510, 1	7.1-100	
1535 arme @ CSMRI-5		
NO 6.58		
semple Motels 1555	0 / 11.7	
1625 sample 115- East	Kedy 1610	
1633 sample 15- West		
1645 Errine OCSMRI-2		
ND 88.16		
semple mits 1700 R	eds 1715	
1780 Keve site		
1755 back at harger, unlos	I truck, finish paperwerk	
1855 Rail hongor		
VISITORS ON SITE:	OKAY (OK) SUPPORTING DOCU	MENTS
	A: DATE-	
2 -1	B: DATE-	
none		
	U. WLLE ID C.SMR.	I-Z, -1, -4, -5, SW-1, -Z
WEATHER CONDITIONS:	OTHER	
WENTER CONDITIONS.		
, ,	A: PRO.105A , WATER LEVEL MEA	SUREMENT. B: AIR MONITORING
surry, overcast, 50's	C: PRO.113B,PRO.113C, and/or PR	O.113D SAMPLE COLLECTION LOG(S)
AMPLING TEAM PERSONNEL: W.	ik Malozyk	
GNATURE OF PREPARER:	- Lander - L	DATE: 2/15/06
		DATE: 3/15/06

			 _				·,	 			
Prol. s/N											
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Starting Flow Rate (L/min.)	704min	Toyn y		1,11	as Umily	68 4 mm	,				
Collection Start Time	1051	105-61		1	972	1634					
Sample Collection Sample Start Date	2/16/06	4		1/1/6/	3/3/6/6	+					
Sample ID	12-1 19-1	PS-1 Unst		12-1	14	43					
Knok	2501	105%		1625		1633	777	**************************************			*****

Appendix D Surface Water Sampling Procedures

Surface Water Sampling

1.0 Scope and Objective

1.1 Scope

This procedure provides instructions and establishes requirements for the collection and documentation of surface water samples by Stoller personnel. This procedure applies to the collection of surface water samples from streams, rivers, ponds, lakes, seeps, impoundments, and other surface sources.

1.2 Objective

The objective of this procedure is to establish a uniform method for the collection of surface water samples that provides representative samples in a safe and responsible manner.

2.0 Definitions

Composite Sample – A sample that is comprised of roughly equal amounts of water collected from a set of sample locations known as a sample group.

Grab Sample – A single sample collected at one sampling point over a short period of time. Grab sample results are representative of the sample location at the time of sample collection. Also called a catch sample.

Peristaltic Pump – A self-priming, low volume pump consisting of a rotor and ball bearing rollers. Tubing placed around the rotors is squeezed by the rotors as they revolve. The squeezing produces a wavelike contractual movement which causes water to be drawn through the tubing. The peristaltic pump is limited to sampling at depths of less than 25 feet.

3.0 Responsibilities and Qualifications

3.1 Project Manager

The Project Manager is responsible for ensuring that surface water samples are properly and safely collected. This will be accomplished through staff training and by maintaining quality control (QC). At a minimum, project management shall:

- 3.1.1 Verify that personnel have reviewed, and are familiar with, site-specific work plans which address surface water sampling, this procedure, and any associated procedures.
- 3.1.2 Ensure that hazards are identified and analyzed with respect to collecting surface water samples, and develop and implement controls to minimize hazards.
- 3.1.3 Provide personnel with training in the operation of surface water sampling equipment and the requirements of this procedure.
- 3.1.4 Periodically review field generated documentation associated with surface water sampling to ensure compliance with project requirements and implement corrective action if necessary.
- 3.1.5 Receive feedback from field sampling personnel in order to continually improve surface water sampling process.

3.2 Site Supervisor

The Site Supervisor is responsible for directing and overseeing all field activities, including sampling, to ensure that site-specific plan requirements are met in a safe and efficient manner within the established safety envelope.

3.3 Field Sampling Personnel

Field sampling personnel are responsible for the proper sample collection and documentation of the sampling event in accordance with this procedure. At a minimum, field sampling personnel have the responsibility to:

- 3.3.1 Familiarize themselves with site-specific work plans, surface water sampling procedures, potential hazards, and health and safety plan.
- 3.3.2 Implement the controls to minimize hazards.
- 3.3.3 Be familiar with sampling equipment and its proper use.
- 3.3.4 Properly complete field documentation.
- 3.3.5 Provide feedback to project manager in order to improve sampling process.

4.0 Equipment/Materials and Calibration

4.1 Equipment/Materials

A number of devices are available for the collection of surface water samples. These devices are constructed of a number of materials including, but not limited to: stainless steel, glass, Teflon*, Tygon*. The sampling and analytical requirements, as well as site characteristics, must be taken into account when determining the proper surface water sampling equipment to use. The site-specific work plans should identify the specific equipment to be used, and methods for safely using equipment.

4.2 Calibration

Equipment shall be calibrated in accordance with manufacturer's recommendations and calibration documentation shall be maintained in project files.

5.0 Method

5.1 Field Preparation

Field preparation requires the organization of sample containers, sample labels, and documentation in an orderly, systematic manner to promote consistency and traceability of all data.

- 5.1.1 General sampling areas will be predetermined to ensure coverage of the various impact scenarios and should be described in project-specific work plans. The location of each sampling point shall be surveyed or mapped and staked as described in Section 5.1.6 prior to sampling.
- 5.1.2 In flowing water, surface water sampling shall be conducted from downstream locations first, then proceed to upstream locations to avoid potential cross contamination from disturbing the substrate.
- 5.1.3 Prior to sampling and between sampling locations, sampling equipment shall be decontaminated.
- 5.1.4 Appropriate personal protective equipment shall be used, as specified in the project-specific health and safety plan.
- 5.1.5 All pertinent information (date, site name, identification number, and location) shall be recorded on a Field Activity Daily Log (FADL) and a Sample Collection Log, as appropriate. Field conditions, unusual circumstances, and weather conditions shall be noted.

- 5.1.6 Due to the nature of sampling an aqueous environment, additional steps are required to verify and mark sample locations. Depending on the project needs, it may be useful to use a Global Positioning System (GPS) to verify and mark the sample locations. Refer to *Field Mapping with a Global Positioning System* for details. The following steps shall be followed by the sampler in addition to the field preparation requirements described in Section 5.1.1.
 - 5.1.6.1 Place a marker (stake) on the shore approximately perpendicular to the sampling location and mark the sample number on the stake.
 - 5.1.6.2 If the sample location is accessible by foot, use a measuring tape to measure the distance between the marked point and the sample location station. Record the compass bearing from the sample location to the shore marker.
 - 5.1.6.3 If the sample location is accessible only by boat, use a rangefinder to estimate the distance to the shore marker to obtain the most accurate measurement. Record the compass bearing from the sample location to the shore marker. It is recommended that the boat's position on the water be stabilized to prevent drifting.
 - 5.1.6.4 Determine and record the distance and direction of each shore marker from a reference point shown on the topographic map and mark all points on a map or use a GPS, if available.
- 5.1.7 Quality Control samples, including field and source blanks, shall be collected in accordance with the project-specific work plan.

5.2 Surface Water Sample Collection Using a Transfer Container

The device most commonly used to collect grab surface water samples is a transfer container (beaker, flask, etc.) made of inert material such as glass, stainless steel or Teflon*. When sampling with a transfer container, the procedure is as follows:

- 5.2.1 Survey and clearly map sampling points as described in Section 5.1.6 prior to sampling. The sample should be collected as close to the mapped location as possible. If the collection point must be moved, the new location must be approved and documented.
- 5.2.2 Dip the transfer container into the surface water. Always use a clean, properly decontaminated transfer container at each sample location.
- 5.2.3 Filter the sample if required.
- 5.2.4 Fill the sample bottle, allowing the sample stream to flow gently down the inside of the bottle with minimal turbulence.
- 5.2.5 Cap the bottle and handle the sample according to the procedures outlined in Project Sample Shipping.
- 5.2.6 Label the sample and document the sampling event.

5.3 Surface Water Sample Collection Using a Peristaltic Pump

A device used to collect composite surface water samples is a peristaltic pump. Samples to be analyzed for volatile organic analysis cannot be composited. When sampling with a peristaltic pump, the procedure is as follows:

5.3.1 Survey and clearly map sampling points as described in Section 5.1.6 prior to sampling. The sample should be collected as close to the mapped location as possible. If a collection point must be moved, the new location must be approved and documented.

- 5.3.2 Attach the appropriate tubing to the peristaltic pump. Always use new tubing at each sample location. Do not try to decontaminate and reuse tubing.
- 5.3.3 If filtering is required, attach the filtering device to the discharge end of the tubing.
- 5.3.4 Lower the intake end of the tubing into the water and begin pumping. If the pump is computerized, program the pump to collect the sample at the desired intervals and flow rate. If the pump is not programmable, record the discharge rate (compute discharge rate by dividing an amount of water collected by the time it took to collect it). Collect the sample at the desired interval.
- 5.3.5 Fill the sample bottle, allowing the sample stream to flow gently down the inside of the bottle with minimal turbulence. The programmable pump will perform this automatically.
- 5.3.6 Cap the bottle and handle the sample according to the procedures outlined in Project Sample and Shipping.
- 5.3.7 Label the sample and document the sampling event.

6.0 Required Inspection/Acceptance Criteria

None.

7.0 Records

The following records generated as a result of implementation of this procedure shall be maintained in a safe manner and submitted to project central files for storage and disposition.

Field Activity Daily Log

Sample Collection Log

Chain of Custody

8.0 References

8.1 Others

- U.S. Environmental Protection Agency. 1987. EPA Compendium of Superfund Field Operations Methods, EPA 540/P-87/001a, OSWER 9355.0-14. Washington, DC.
- U.S. Environmental Protection Agency. 1988. *EPA Guidance for Conducting Remedial Investigation and Feasibility Studies under CERCLA*, Interim Final OSWER Directive 9355.3-01. Washington, DC.
- American Public Health Association, American Water Works Association, Water Pollution Control Federation. 1985. Standard Methods for the Examination of Water and Wastewater, 16th Edition, American Public Health Association, Washington, DC.

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Appendix E Data Validation Reports

DATA VALIDATION REPORT

To:

Steve Brinkman-Stoller

From:

John Garrett

Date:

March 1, 2006

Project/Site:

CSMRI

Project No.:

4060-530

SDG No.:

0601121

This report presents the radiological data validation for the data obtained during the field activities for the above referenced work assignment. The purpose of this review is to provide a technical evaluation of the radiological results that were obtained by Paragon Procedure PA SOP 714R9 for Isotopic/Total Uranium and Isotopic Thorium by alpha spectrometry, PA SOP 783R5 for Radium-226 by Radon Emanation counting, Gross Alpha and Gross Beta by gas proportional counting, for SDG 0601121 from Paragon Analytics, Inc. (Fort Collins, CO). This report consists of 2 filter samples for the CSMRI/4060-530 project collected on January 19, 2006. The filter samples were analyzed for Isotopic/Total Uranium on February 10, 2006 and Isotopic Thorium on February 11, 2006 by alpha spectrometry, Radium-226 by Radon Emanation Counting on February 14, 2006, and Gross Alpha and Gross Beta by gas proportional counting on January 31, 2006. All analyses were conducted by Paragon Analytics, Inc. The field sample numbers and corresponding laboratory numbers are presented below:

Laboratory Sample Number	Client Sample Number	Matrix
0601121-1	AS-East	Filter
0601121-2	AS-West	Filter

Data validation was conducted in accordance with the Analytical Services Statement of Work for the following modules: the Determination of Radionuclides by Alpha Spectrometry, Module RC01-v2, October 1, 2002, and the Determination of Gross Alpha and Beta by Gas Proportional Counting, Module RC04-v2, October 1, 2002, and U.S. DOE Quality Systems for Analytical Services rev 1 (QSAS).

The radiological data were evaluated based on the following parameters:

- * Data Completeness
- * Holding Times and Preservation
- * Instrument Initial Calibrations
- * Instrument Performance Checks
- * Preparation Blanks
- * Duplicate Sample Results
- * Laboratory Control Samples (LCS) Results

- * Laboratory Control Samples Duplicate (LCSD) Results
- * Compound Quantitation and Reporting Limits (full validation only)

Data Completeness

The data package was complete as per Paragon Procedure PA SOP 714R9 for Isotopic/Total Uranium and Isotopic Thorium by alpha spectrometry, PA SOP 783R5 for Radium-226 by Radon Emanation counting, Gross Alpha and Gross Beta by gas proportional counting, for SDG 0601121.

Holding Times and Preservation

Analytical holding times were evaluated and all criteria were met. However, holding time requirements are not applicable to radiochemistry analyses unless the isotopes of interest have short half-lives.

Calibrations

The instruments were calibrated at the required frequency.

Initial Calibration

All instruments were calibrated properly using NIST traceable SRM.

Instrument Performance Checks

All isotopes were within criteria.

Preparation Blanks

All of the isotopes that were analyzed had activities that were below their respective MDCs in the preparation.

Duplicate Sample Analysis

Due to insufficient sample volume to perform a laboratory duplicate, a duplicate LCS was analyzed for isotopic uranium and thorium by alpha spectrometry, Radium-226 by radon emanation, and a duplicate analysis of sample AS-West for Gross Alpha and Gross Beta by gas proportional counting. All isotopic activities for LCS and LCS duplicate and for original and duplicate analysis were within the limits of the statistical test for equivalency. No action was required.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicates were not performed for the samples in this SDG, nor were any required.

Laboratory Control Samples

The laboratory analyzed laboratory control samples for Uranium-238, Uranium-234, and Thorium-230 for alpha spectrometry, Radium-226 by radon emanation and Gross Alpha and Gross Beta by gas proportional counting. All recoveries were within 75-125% limits. No calculation errors or transcription errors were found.

Analyte Quantitation and Reporting Limits

Analyte quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Uranium-234 and Uranium-238 activities were detected above the MDC but well below the RDLs in the filter sample AS-EAST. No action was taken.

The laboratory reports that measurable amounts of Uranium-234 in the samples may cause a small amount of characteristic activity in the Uranium-235 region of interest due to poorly resolved alpha activity at the boundary between the 2 regions. To minimize the potential for high bias in the Uranium-235 analytical results, the Uranium-235 ROI has been narrowed and limited to a lower energy region. An 85.1% abundance correction has been made to the final Uranium-235 results. The laboratory reports Total Uranium and no action is necessary.

The laboratory provided a calculated value (in pCi/sample) for total uranium in each filter sample based on the measured values by alpha spectrometry of the individual uranium isotopic activities. No action was required.

No Thorium-232, Thorium-230, or Thorium-228 activities were observed above their MDCs in either filter sample. No action was necessary.

Radium-226 was detected above the MDC in both of the filter samples. No action was required.

No Gross Alpha activities were observed above three times (3X) their MDC in either filter sample and were not considered as detected. Gross Beta activities were observed above three times (3X) their MDC in both filter samples. No action was taken.

Analyte Quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Overall Comments

No activities for isotopes of uranium and thorium by alpha spectrometry were observed above the RDL in any samples. Radium-226 activities were observed above their MDCs. No Gross Alpha activity was observed in either filter sample. Gross Beta activities were above the MDCs in both filter samples. No action was required.

DATA QUALIFIER DEFINITIONS

For the purpose of Data Validation, the following code letters and associated definitions are provided for use by the data validator to summarize the data quality.

- R Reported value is "rejected." Resampling or reanalysis may be necessary to verify the presence or absence of the compound.
- J The associated numerical value is an estimated quantity because the Quality Control criteria were not met.
- U J The reported quantitation limit is estimated because Quality Control criteria were not met. Element or compound was not detected.
- The material was analyzed for, but was not detected above the level of the associated value. The associated value is either the sample quantitation limit or the sample detection limit.
- NR Result was not used from a particular sample analysis. This typically occurs when more than one result for an element is reported due to dilutions and reanalyses.

DATA VALIDATION REPORT

To:

Robert Hill/Steve Brinkman- Stoller

From:

John Garrett

Date:

April 4, 2006

Project/Site:

CSMRI

Project No.:

4060-530

SDG No.:

0602166

This report presents the radiological data validation for the data obtained during the field activities for the above referenced work assignment. The purpose of this review is to provide a technical evaluation of the radiological results that were obtained by Paragon Procedure PA SOP 714R9 for Isotopic/Total Uranium and Isotopic Thorium by alpha spectrometry, PA SOP 783R5 for Radium-226 by Radon Emanation counting, Gross Alpha and Gross Beta by gas proportional counting, for SDG 0602166 from Paragon Analytics, Inc. (Fort Collins, CO). This report consists of 2 filter samples for the CSMRI/ 4060-530 project collected on February 16, 2006. The filter samples were analyzed for Isotopic/Total Uranium and Isotopic Thorium on March 12, 2006 by alpha spectrometry, Radium-226 by Radon Emanation Counting on March 16, 2006, and Gross Alpha and Gross Beta by gas proportional counting on March 12, 2006. All analyses were conducted by Paragon Analytics, Inc. The field sample numbers and corresponding laboratory numbers are presented below:

Laboratory sample Number	Client Sample Number	Matrix
0602166-1	AS-East	Filter
0602166-2	AS-West	Filter

Data validation was conducted in accordance with the Analytical Services Statement of Work for the following modules: the Determination of Radionuclides by Alpha Spectrometry, Module RC01-v2, October 1, 2002, and the Determination of Gross Alpha and Beta by Gas Proportional Counting, Module RC04-v2, October 1, 2002, and U.S. DOE Quality Systems for Analytical Services rev 1 (QSAS).

The radiological data were evaluated based on the following parameters:

- * Data Completeness
- * Holding Times and Preservation
- * Instrument Initial Calibrations
- * Instrument Performance Checks
- * Preparation Blanks
- * Duplicate Sample Results
- * Laboratory Control Samples (LCS) Results

- * Laboratory Control Samples Duplicate (LCSD) Results
- * Compound Quantitation and Reporting Limits (full validation only)

Data Completeness

The data package was complete as per Paragon Procedure PA SOP 714R9 for Isotopic/Total Uranium and Isotopic Thorium by alpha spectrometry, PA SOP 783R5 for Radium-226 by Radon Emanation counting, Gross Alpha and Gross Beta by gas proportional counting, for SDG 0602166.

Holding Times and Preservation

Analytical holding times were evaluated and all criteria were met. However, holding time requirements are not applicable to radiochemistry analyses unless the isotopes of interest have short half-lives.

Calibrations

The instruments were calibrated at the required frequency.

Initial Calibration

All instruments were calibrated properly using NIST traceable SRM.

Instrument Performance Checks

All isotopes were within criteria.

Preparation Blanks

All of the isotopes that were analyzed had activities that were below their respective MDCs in the preparation.

Duplicate Sample Analysis

Due to insufficient sample volume to perform a laboratory duplicate, a duplicate LCS was analyzed for isotopic uranium and thorium by alpha spectrometry, Radium-226 by radon emanation, and a duplicate analysis of sample AS-East for Gross Alpha and Gross Beta by gas proportional counting. All isotopic activities for LCS and LCS duplicate and for original and duplicate analysis were within the limits of the statistical test for equivalency. No action was required.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicates were not performed for the samples in this SDG, nor were any required.

Laboratory Control Samples

The laboratory analyzed laboratory control samples for Uranium-238, Uranium-234, and Thorium-230 for alpha spectrometry, Radium-226 by radon emanation and Gross Alpha and Gross Beta by gas proportional counting. All recoveries were within 75-125% limits. No calculation errors or transcription errors were found.

Analyte Quantitation and Reporting Limits

Analyte quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Uranium-234 and Uranium-238 activities were detected above the MDC but below the RDLs in the filter samples and Uranium-235 activity was detected above the MDC but well below the RDL in the filter sample AS-EAST. No action was taken.

The laboratory reports that measurable amounts of Uranium-234 in the samples may cause a small amount of characteristic activity in the Uranium-235 region of interest due to poorly resolved alpha activity at the boundary between the 2 regions. To minimize the potential for high bias in the Uranium-235 analytical results, the Uranium-235 ROI has been narrowed and limited to a lower energy region. An 85.1% abundance correction has been made to the final Uranium-235 results. The laboratory reports Total Uranium and no action is necessary.

The laboratory provided a calculated value (in pCi/sample) for total uranium in each filter sample based on the measured values by alpha spectrometry of the individual uranium isotopic activities. No action was required.

No Thorium-232, Thorium-230, or Thorium-228 activities were observed above their MDCs in either filter sample. No action was necessary.

No Radium-226 was detected above the MDC in either of the filter samples. No action was required.

No Gross Alpha activities were observed above three times (3X) their MDC in either filter sample and were not considered as detected. Gross Beta activities were observed above three times (3X) their MDC in both filter samples. No action was taken.

Analyte Quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Overall Comments

No activities for isotopes of uranium and thorium by alpha spectrometry were observed above the RDL in any samples. Radium-226 activities were observed above their MDCs. No Gross Alpha activity was observed in either filter sample. Gross Beta activities were above the MDCs in both filter samples. No action was required.

DATA QUALIFIER DEFINITIONS

For the purpose of Data Validation, the following code letters and associated definitions are provided for use by the data validator to summarize the data quality.

- R Reported value is "rejected." Resampling or reanalysis may be necessary to verify the presence or absence of the compound.
- J The associated numerical value is an estimated quantity because the Quality Control criteria were not met.
- U J The reported quantitation limit is estimated because Quality Control criteria were not met. Element or compound was not detected.
- U The material was analyzed for, but was not detected above the level of the associated value. The associated value is either the sample quantitation limit or the sample detection limit.
- NR Result was not used from a particular sample analysis. This typically occurs when more than one result for an element is reported due to dilutions and reanalyses.

DATA VALIDATION REPORT

To:

Steve Brinkman-Stoller

From:

John Garrett

Date:

April 23, 2006

Project/Site:

CSMRI

Project No.:

CO School of Mines

SDG No.:

0603095

This report presents the inorganic metals data validation for the data obtained for seven CSMRI water samples collected on March 15, 2006 and submitted to Paragon Analytics, Inc on March 15, 2006 for the above referenced work assignment. The purpose of this review is to provide a technical evaluation of the inorganic metals results that were obtained by SW-846, 3rd edition, Method 6010B and Paragon Procedure PA SOP 834R4 for trace metals by Inductively Coupled Plasma (ICP) atomic emission spectrophotometry analysis, and mercury results that were obtained by SW-846, 3rd Edition, Method 7470A and PA SOP 812R11 for mercury by Cold Vapor Atomic Absorption (CVAA) analysis for SDG 0603095 from Paragon Analytics, Inc. (Fort Collins, CO). The water samples were analyzed for ICP trace metals on April 7, 2006, and mercury by CVAA on March 23, 2006. All analyses were conducted by Paragon Analytics, Inc. The field sample numbers and corresponding laboratory numbers are presented below:

Laboratory Sample Number	Client Sample Number	Matrix
0603095-1	CSMRI-1	Water
0603095-2	CSMRI-2	Water
0603095-3	CSMRI-4	Water
0603095-4	CSMRI-5	Water
0603095-5	SW-1	Water
0603095-6	SW-2	Water
0603095-7	Equipment Blank	Water.

Data validation was conducted in accordance with the USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review.

The metals and mercury data were evaluated based on the following parameters:

- * Data Completeness
- * Holding Times and Preservation
- * Initial and Continuing Calibration Verification
- * Contract Required Detection Limit (CRDL)
 Preparation/ Initial (ICB)/ and Continuing (CCB) Calibration Blanks
- * Interference Check Sample (ICSA) Results
- * Matrix Spike Results

- * Duplicate Sample Results
- * Laboratory Control Samples (LCS) Results Serial Dilution Sample Results
- * Compound Quantitation and Reporting Limits (full validation only)
- * All criteria were met for this parameter

Data Completeness

The data package was complete except for the missing CRDL (2B) and IDL (10) QC Summary Forms. No results were qualified as a result of the missing data.

Holding Times and Preservation

Analytical holding times were evaluated and all criteria were met.

The water samples were all found to be field filtered, preserved in nitric acid, and cooled to 2.4 degrees centigrade upon receipt by the laboratory. No action was taken.

Initial and Continuing Calibration Verification

Initial and Continuing Calibration Verification standards were analyzed at the required frequency and all were within the required 90-110% limits for ICP trace metals and within 80-120% for mercury by CVAA. No action was necessary.

Contract Required Detection Limit (CRDL)

No CRDL or CRI standard recovery summary forms (EPA Form 2b) were included in the data package. The reviewer obtained the %Rs from the instrument raw data. All CRDL %Rs for ICP and CRI %Rs for mercury were within 80-120% limits. No action was necessary.

Preparation and Initial/ Continuing Calibration Blanks

Preparation and Initial/ Continuing Calibration Blanks are evaluated to assess the level of contamination in the preparation and analytical processes.

Preparation and Initial/ Continuing Calibration Blanks were prepared and analyzed at the required frequencies.

All of the blanks that were analyzed had concentrations that were below their respective Reporting Limits (RLs).

However, if blank results were above the Instrument Detection Limits (IDLs) and below

the RLs, it caused the associated sample results to be qualified for contamination as estimated and non-detected [UJ 107]. If blank results were below the negate IDL and above the negate RL, it caused the associated sample results to be qualified for negative contamination as estimated [J 107]. The following sample results were qualified due to blank contamination:

- Barium, Calcium, Chromium, Magnesium and potassium in all samples. [J/UJ 107]
- Mercury in all samples. [UJ 107]

Interference Check Sample (ICSA) Results

Interference Check Samples were prepared and analyzed at the required frequencies.

No aqueous concentrations of aluminum, calcium, iron, or magnesium exceeded the ICSA values in any of the samples. No action was necessary.

Matrix Spike/Matrix Spike Duplicate Results

All ICP and Mercury MS/MSD percent recoveries were within 75-125% limits. No action was necessary.

Duplicate Sample Analysis

All ICP and Mercury original sample/duplicate sample and MS/MSD differences were less than 20% RPD or less than the RDL for results less than (5)(RDL). No actions were necessary.

Laboratory Control Samples

The laboratory analyzed laboratory control samples for all metals and mercury. All recoveries were within 80-120% limits. No action was necessary.

Serial Dilution Results

All %Ds were less than 10% for all ICP metals with the exception of zinc.

Analyte Quantitation and Reporting Limits

Analyte quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Overall Comments

Several samples were qualified as estimated and non-detected [UJ 107] and /or estimated [J 107] due to contamination found in the associated method or calibration blanks above the IDLs but below the RLs (or below the negate IDLs but above the negate RLs).

No CRDL or CRI standard recovery summary forms (EPA Form 2b) were included in the data package. The reviewer obtained the results from the raw data. No action was necessary.

DATA QUALIFIER DEFINITIONS

For the purpose of Data Validation, the following code letters and associated definitions are provided for use by the data validator to summarize the data quality.

- R Reported value is "rejected." Resampling or reanalysis may be necessary to verify the presence or absence of the compound.
- J The associated numerical value is an estimated quantity because the Quality Control criteria were not met.
- U J The reported quantitation limit is estimated because Quality Control criteria were not met. Element or compound was not detected.
- U The material was analyzed for, but was not detected above the level of the associated value. The associated value is either the sample quantitation limit or the sample detection limit.
- NR Result was not used from a particular sample analysis. This typically occurs when more than one result for an element is reported due to dilutions and reanalyses.

DATA VALIDATION REPORT

To:

Steve Brinkman- Stoller

From:

John Garrett

Date:

April 21, 2006

Project/Site:

CSMRI

Project No.:

CO School of Mines

SDG No.:

0603095

This report presents the radiological data validation for the data obtained during the field activities for the above referenced work assignment. The purpose of this review is to provide a technical evaluation of the radiological results that were obtained by Paragon Procedure PA SOP 714R9 for Isotopic/Total Uranium and Isotopic Thorium by alpha spectrometry, PA SOP 783R5 for Radium-226 by Radon Emanation counting, Radium-228 and Gross Alpha and Gross Beta by gas proportional counting, for SDG 0603095 from Paragon Analytics, Inc. (Fort Collins, CO). This report consists of 2 filter samples and 7 water samples for the CSMRI project collected on March, 15, 2006. The two filter samples were analyzed for Isotopic/Total Uranium on March 30, 2006 and the seven water samples were analyzed on March 23, 2006 and March 30, 2006 by alpha spectrometry. Two filter samples and seven water samples were analyzed for Isotopic Thorium on March 23, 2006 and March 30, 2006 by alpha spectrometry. Two filter samples and seven water samples were analyzed Radium-226 by Radon Emanation Counting on March 30, 2006, March 31, 2006 and April 10, 2006. Seven water samples were analyzed Radium-228 by Gas Flow Proportional Counting on April 3, 2006, Two filter samples were analyzed for Gross Alpha and Gross Beta by gas proportional counting on March 21, 2006. All analyses were conducted by Paragon Analytics, Inc. The field sample numbers and corresponding laboratory numbers are presented below:

Laboratory Sample Number	Client Sample Number	Matrix		
0603095-1	CSMRI-1	Water		
0603095-2	CSMRI-2	Water		
0603095-3	CSMRI-4	Water		
0603095-4	CSMRI-5	Water		
0603095-5	SW-1	Water		
0603095-6	SW-2	Water		
0603095-7	Equipment Blank	Water		
0603095-8	AS-East	Filter		
0603095-9	AS-West	Filter		

Data validation was conducted in accordance with the Analytical Services Division of the Statement of Work for the following modules: the Determination of Radionuclides by

Alpha Spectrometry, Module RC01-v2, October 1, 2002, and the Determination of Radium-228 and Gross Alpha and Beta by Gas Proportional Counting, Module RC04-v2, October 1, 2002, and ICPT BOA and U.S. DOE Quality Systems for Analytical Services rev 1 (QSAS).

The radiological data were evaluated based on the following parameters:

- * Data Completeness
- * Holding Times and Preservation
- * Instrument Initial Calibrations
- * Instrument Performance Checks
- * Preparation Blanks
- * Duplicate Sample Results
- * Laboratory Control Samples (LCS) Results
- * Laboratory Control Samples Duplicate (LCSD) Results
- * Compound Quantitation and Reporting Limits (full validation only)

Data Completeness

The data package was complete as per Paragon Procedure PA SOP 714R9 for Isotopic/Total Uranium and Isotopic Thorium by alpha spectrometry, PA SOP 783R5 for Radium-226 by Radon Emanation counting, PA SOP 724R8 for Radium-228 by gas flow proportional counting, Gross Alpha and Gross Beta by gas proportional counting, for SDG 0603095.

Holding Times and Preservation

Analytical holding times were evaluated and all criteria were met. However, holding time requirements are not applicable to radiochemistry analyses unless the isotopes of interest have short half-lives.

Calibrations

The instruments were calibrated at the required frequency.

Initial Calibration

All instruments were calibrated properly using NIST traceable SRM.

Instrument Performance Checks

All isotopes were within criteria.

Preparation Blanks

The Uranium-234 and Uranium-238 activities exceeded the MDCs in the aqueous sample batch Method Blank analyses. The reported activities and the MDCs exceeded the RDL. Isotopic Uranium activities were below the MDCs in the Equipment Blank sample and above the MDC but below the RDL in the Filter samples.

The Thorium-230 activity exceeded the MDC in the aqueous sample batch Method Blank analysis. The reported activity and the MDC were below the RDL and no action was taken Thorium-230 activities exceeded the reported MDCs but were below the RDL in samples CSMRI-2, CSMRI-4, SW-2 and the Equipment Blank.

All of the isotopes that were analyzed had activities that were below their respective MDCs in the Preparation Blanks.

Duplicate Sample Analysis

Due to insufficient sample volume to perform a laboratory duplicate, a duplicate LCS was analyzed for isotopic uranium and thorium by alpha spectrometry, Radium-228 by GPC, Radium-226 by radon emanation, and a duplicate analysis of sample AS-East for Gross Alpha and Gross Beta by gas proportional counting. All isotopic activities for LCS and LCS duplicate and for original and duplicate analysis were within the limits of the statistical test for equivalency. No action was required.

Matrix Spike/Matrix Spike Duplicates

Matrix spike/matrix spike duplicates were not performed for the samples in this SDG, nor were any required.

Laboratory Control Samples

The laboratory analyzed laboratory control samples for Uranium-238, Uranium-234, and Thorium-230 for alpha spectrometry, Radium-226 by radon emanation, Radium-228 and Gross Alpha and Gross Beta by gas proportional counting. All recoveries were within 75-125% limits. No calculation errors or transcription errors were found.

Isotopic Thorium by Alpha Spectroscopy samples and the associated QC samples, LCSs were not analyzed consecutively or in the sample timeframe as the samples. Please see Overall Comments.

Analyte Quantitation and Reporting Limits

Analyte quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Uranium-234 and Uranium-238 activities were observed above the MDCs in all aqueous samples and Uranium-234 activities were observed above the RDL in samples CSMRI-1, CSMRI-4 and CSMRI-5. Uranium-238 activities were observed above the RDL in samples CSMRI-4 and CSMRI-5.

Uranium-234 activity was detected above the MDC but well below the RDL in the filter sample AS-West. No action was taken.

The laboratory reports that measurable amounts of Uranium-234 in the samples may cause a small amount of characteristic activity in the Uranium-235 region of interest due to poorly resolved alpha activity at the boundary between the 2 regions. To minimize the potential for high bias in the Uranium-235 analytical results, the Uranium-235 ROI has been narrowed and limited to a lower energy region. An 85.1% abundance correction has been made to the final Uranium-235 results. The laboratory reports Total Uranium and no action is necessary.

The laboratory provided a calculated value (in pCi/sample) for total uranium in each filter sample based on the measured values by alpha spectrometry of the individual uranium isotopic activities. No action was required.

Thorium-230 activities exceeded the reported MDCs but were below the RDL in water samples CSMRI-2, CSMRI-4, SW-2 and the Equipment Blank.

No Thorium-232, Thorium-230, or Thorium-228 activities were observed above their MDCs in either filter sample. No action was necessary.

Radium-226 was detected above the MDC above the MDCs in water samples CSMRI-2 and CSMRI-5.

No Radium-226 was detected above the MDC in both of the filter samples. No action was required.

Radium-228 was detected above the RDL in sample CSMRI-2.

No Gross Alpha activities were observed above three times (3X) their MDC in either filter sample and were not considered as detected. Gross Beta activities were observed above three times (3X) their MDC in both filter samples. No action was taken.

Analyte Quantitation was evaluated for all samples. No calculation or transcription errors were found. The results and reporting limits were correctly reported.

Overall Comments

No activities for isotopes of uranium and thorium by alpha spectrometry were observed above the RDL in any samples. Radium-226 activities were observed above their MDCs. No Gross Alpha activity was observed in either filter sample. Gross Beta activities were above the MDCs in both filter samples. No action was required.

The laboratory analyzed laboratory control samples for Total Uranium (129%), Uranium-238 (132%), and Uranium-234 (123%) by alpha spectrometry recoveries were outside the 75-125% limits. The associated data is qualified as estimated (J).

DATA QUALIFIER DEFINITIONS

For the purpose of Data Validation, the following code letters and associated definitions are provided for use by the data validator to summarize the data quality.

- R Reported value is "rejected." Resampling or reanalysis may be necessary to verify the presence or absence of the compound.
- J The associated numerical value is an estimated quantity because the Quality Control criteria were not met.
- U J The reported quantitation limit is estimated because Quality Control criteria were not met. Element or compound was not detected.
- The material was analyzed for, but was not detected above the level of the associated value. The associated value is either the sample quantitation limit or the sample detection limit.
- NR Result was not used from a particular sample analysis. This typically occurs
 when more than one result for an element is reported due to dilutions and
 reanalyses.

Appendix G Chain-of-Custody Documentation

Paragon Analytics

Project Name / No.: CO Sel

A Division of DataChem Laboratories, Inc.

80524 225 Commerce Drive Fort Collins, CO

800-443-1511 or (970) 490-1511 (970) 490-1522 Fax

211000 Page __ of Chain-of-Custody Date 1/19/66 Accession Number (LAB ID)

Originator: Retain pink copy

Return to Client WOG- 715ED- WISH 1744 77-05江 ö Gamma Isotopes f.1063 Strontium 90 D5811-00 Strontium 89 D5811-00 Hadium 228 SW9320 E904.0 Radium 226 E903.1 Printed Name Signature SW9315 E903.0 muibsR gnittim3-shqlA lsto Received Signature, Printed Na Sompany Sompany Dispose: Date Date Date, 0'9067 muilinT Pu / U / Am / Th / Cm / __ Actinides by Paragon SOP ε 0.0063 016eW8 Gross Alpha / Beta 000/ GRO DRO SW8015B (both) HqT 2M9040B SW9045C Hq Total E160.3 TDS E160.1 TSS E160.2 Time :sbilo2 SW9056 E300.0 (specify in comments) enoinA sinsgroni N / Y Sikaline Digest? Y / N Standard or Rush (Due A8617W2 Hexavalent Chromium SW6020 E200.8 ILMO Dissolved Metals by ICP/MS Printed Name Printed Name Received By Date ______ Signature 🗻 2M6020 E200.8 ILMO_ Lotal Metals by ICP/MS Date 2 Sompany Signature Company SW6010B 7470 E200 ILMO_ Dissolved Metals by ICP SW6010B 7470 7471 E200 ILMO_ Total Metals by ICP Form 202r5.xls (4/6/04) E = extract, F = filterTCLP Metals SW1311 1747WS 80108WS Turnaround (circle one): SW8260B 8270C 8081A 8151A TCLP Organics SW1311 2W8330 Explosives SW8151A Herbicides 2M,8085 E608 **bCB**² SW8081A E608 OC Pesticides SW8270C E625 SAOCS SW8021B BTEX (only) Sampler(s): Mules SW8260B E624 E524.2 NOCe (comments) No. of Containers (indicate type) ı Preservative soil, U Matrix Circle method (right); provide additional information as OI de O = oilwhyth, is soonl project # 4060-530 7712 27152 E-mail: shirtoner @ stoller.com Time * 07570 Matrix Key: Date Phone: (303) 546-4388 Report To: Steve Brinkmen Fax: (303) 443-1408 Company: stale= MST 220 Sample ID CST 15- West Time Zone: EST Address: Comments:

Paragon Analytics
A*B/Vision/OfficehemEaborage

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aragon Analytics

225 Commerce Drive Fort Collins, CO: 800-443-1511 or (970) 490-1511 (970) 490-1512 A Division of DataChem Laboratories, Inc.

Originator: Retain pink copy (5)<u>R</u> Return to Client Time ŏ f.1063 Gamma Isotopes Strontium 90 D5811-00 00-1185G 68 multinotic Relinquished By Hadium 228 SW9320 E904.0 Radium 226 E903.1 Printed Name Printed Name Received By SW9315 E903.0 Signature muibsA gnittim3-sdqlA lato Signature Company Dispose: Date Date Date E906.0 muilinī Actinides by Paragon SOP Pu / U / Am / Th / Cm /_ $\widehat{\Xi}$ SW9310 E900.0 Gross Alpha / Beta GRO DRO SW8015B (both) HqT 2M9040B SW9045C Hd Total E160.3 TDS E160.1 TSS E160.2 :spiloS SW9056 E300.0 (specify in comments) Inorganic Anions SW7196A Alkaline Digest? Y / N Hexavalent Chromium Turnaround (circle one) Standard of Rush (Due SM6020 E200.8 ILMO Dissolved Metals by ICP/MS Signature // Printed Name Date 3/16 Printed Name Received By 2M6020 E200.8 ILMO Total Metals by ICP/MS Sompany SW6010B 7470 E200 ILMO_ Dissolved Metals by ICP Date SW6010B 7470 7471 E200 ILMO Total Metals by ICP TCLP Metals SW1311 1747WS 80108WS SW8260B 8270C 8081A 8151A TCLP Organics SW1311 0668W8 Explosives Arat8W8 Herbicides L = liquid, 2M8085 E008 **bCBs** SW8081A E608 OC Pesticides W = water, 2M8570C E625 SAOCs BTEX (only) SW8021B NS = non-soil solid, 2M8560B E624 E524.2 NOCE (comments) No. of Containers (indicate type) Preservative Sampler(s): Circle method (right); provide additional information as needed O = oil, S = soil, Matrix Lab ID Showking a Charle Com 350 1535 12/0 1250 0741 15051 Time, 17/5 1235 1610 Phone: (363) 442-4911-1883 Later, C.O. 50006 Matrix Key: Date N. Project Name / No.: CO School 3711-5/111 See 14 PST MST Report To: Strve Company: 5.24 Sample ID CST 140 Fax: (343) 7 Time Zone: EST 1 × 12157 アメルシン Ä 215 Address: E-mail: Ý. Comments: 1/2/

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Form 202r5.xls (4/6/04)

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Project Name / No.: COSKE

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- 26.420 Return to Client Time Time ö F901.1 Gamma Isotopes Strontium 90 D5811-00 00-1183G 68 multuorts Radium 228 SW9320 E904.0 Radium 226 E903.1 Printed Name Printed Name Received By Signature Signature SW9315 E903.0 muibsA gaittim3-sdqlA isto Sompany Dispose: Date Date 0.3063 multinT Actinides by Paragon SOP -\m2\dT\mA\U\u9 $\widehat{\Xi}$ 2M3310 E300'0 Gross Alpha / Beta GRO DRO SW80158 (both) HqT 2M8040B 2M8042C Нď Time Total E160.3 TDS E160.1 TSS E160.2 :spiloS E300.0 (specify in comments) 9906MS Inorganic Anions SW7196A Alkaline Digest? Y / N Hexavalent Chromium Rush (Due SM6020 E200.8 ILMO_ Dissolved Metals, by ICP/MS)ate _3//6 Printed Name Printed Name Received By Signature Company Signature Total Metals by ICP/MS Company **2M6020 E200.8 ILMO** Date 2M6010B 7470 E200 ILMO_ Dissolved Metals by ICP one):(Standard SW6010B 7470 7471 E200 ILMO Cotal Metals by ICP Form 202r5,xls (4/6/04) 1747WS 80109WS TCLP Metals SW1311 ICLP Organics SW1311 SW8260B 8270C 8081A 8151A Matrix Key: O = oil, S = soil, NS = non-soil solid, W = water, L = liquid, E = extract, 0EE8MS Explosives Turnaround (circle A1318WS Herbicides 2M8085 Ee08 **bcBs** OC Pesticides SW8081A E608 2M8570C E625 SAOCS BTEX (only) SW8021B SW8260B E624 E524.2 NOCe Circle method (right); provide additional information as needed (comments) No. of Containers (indicate type) 4 Preservative Mire's Sampler(s): 3 Matrix Ų Cab ID 17/10 Time * 11/25 1200 10.33 1210 Date Time Zone: EST CST MST 3 100 Sample ID 32-17-5/2 4.3-2 ŗī, Report To: Company: Address: Comments: なう Phone: E-mail: Fax:

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