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## POLICY ON SOIL PERCENTAGE REDUCTION

**Effective Date: 3/14/12**

The process of resampling the soil source(s) [maximum location(s)] and determining a percentage reduction factor to be applied to historic soil sampling data was put in place when Risk Based Corrective Action (RBCA) was new. At that time, the purpose for establishing a 'soil percent reduction' method was primarily to assist responsible parties and certified groundwater professionals in converting existing data from extensive site evaluations (SCRs) into the new RBCA format without incurring significant additional costs associated with soil plume resampling. At the time several hundred sites had recently completed SCR evaluations and a conversion process was set up to reduce field costs and find a way to use or convert existing data. It was never intended to be an ongoing method for assessing soil conditions at a site and we believe the process has outlived its initial purpose. As such, this notice provides clarification on soil resampling and the use of percent reduction.

- Soil percentage reduction will no longer be allowed for RBCA evaluations, or post RBCA sampling.
- Depending on the purpose, soil resampling may encompass resampling all locations formerly found to exceed target levels, or a portion thereof, and/or at various new areas within the soil summary corrective action plume to determine current conditions or verify the effectiveness of remediation. The sampling scheme should be discussed with the DNR project manager. Sampling events must be separated by at least 6 months. Newly collected data can replace old soil data when the sample is collected within 5 feet of the former sample, at the same depth, and at the interval with the maximum field screening reading, if not the same interval as the previous sample. Refer to guidance for additional information.
- Recognize and incorporate the newer soil target levels associated with water line receptors. Soil resampling may be warranted to determine current risk, particularly with respect to toluene (which now has a lower target level) and xylenes (which previously did not have a target level established).
- If reports have already been submitted and accepted by DNR where soil percentage reduction was used, the percentage reduction data is considered acceptable. For reports submitted by the effective date but not yet reviewed, DNR will determine acceptability of soil percentage reduction on a case by case basis.

Questions, contact Elaine Douskey, [elaine.douskey@dnr.iowa.gov](mailto:elaine.douskey@dnr.iowa.gov) or at 515.281.8011