

Posted 8/13/2013

SOIL SAMPLING GUIDANCE FOR NON-HIGH RISK SITES

Questions have arisen regarding over-excavation (OE) and/or “expedited corrective action” at sites that are not a typical high risk site in need of corrective action -- for example, conducting excavation at a low risk site, or conducting OE to address free product at a site classified ‘no action required’ with a free product recovery requirement. The general question is what soil sampling/ testing is required in these situations?

There are several considerations in addressing these circumstances:

- Although the site may have been classified, the data used in the evaluation may have been limited in scope (e.g., data derived from percentage reduction)
- As the excavation is conducted, it may become apparent (visual, olfactory) that additional sources or ‘pockets’ of soil contamination are present that were not previously known, or documented in prior assessments.
- To establish soil target levels have been met (e.g., doing corrective action at a low risk site), sampling of the “area of concern” is needed to determine current levels.
- When disposing of petroleum contaminated soil via landfarm or landfill, sampling may be required to establish levels in materials being disposed.
- For bedrock sites, it is especially important to remove or treat all soil above action levels; sampling would be warranted to establish the success of the excavation.
- As a corrective action measure to remove free product, the recovery activities and sampling plan should be identified in the free product recovery assessment report (135.7(5)d).
- Other unforeseen issues (e.g., suspected new release).

As such, the general expectation for any excavation of contaminated soil is to follow the requirements outlined in 135.12(11) –*Expedited corrective action*, which includes field screening and laboratory analyzed samples. An alternate to these requirements may be proposed on a case-by-case basis. The proposal must include the alternative sampling plan and a justification for why the alternative plan is sufficient to achieve (or document) the goals of the project. For alternative approaches the planned activities must be discussed with, and approved by the DNR project manager. If needed, a meeting among the primary parties (DNR, CGP, RP, Fund) can be held to determine an agreed-upon approach.

If you have any questions please feel free to contact Elaine Douskey (515) 281-8011 or Elaine.douskey@dnr.iowa.gov