Record of Modification

Phase 1 Site Characterization Sampling and Analysis Plan Field Activities
Columbia Fall Aluminum Company RI/FS
Phase 1 SAP MOD #1

Instructions to Requester: **Submit to Roux RI Manager or Roux RI/FS Project Manager**
Roux RI Manager will maintain legible copies in a binder that can be accessed by personnel.

Project Work Plan/QAPP (check one):

[X] 2015 Phase 1 SAP

[ ] SOP (Title, # and approval date): _____

Requester: Michael Ritorto, RI Manager Date: 7/21/2016

Applicable section of SAP/SOP:

SAP Section 4.6.2: Operational Area Soil Investigation

Description of Modification:

The incremental soil samples collected from the 0.5 to 2 ft depth intervals will not be analyzed for volatile organic compounds (VOCs). This affects 43 sample locations where incremental soil samples are to be collected.

Rationale for Modifications / Potential Implications of Modifications:

As described in the SAP, the incremental soil sampling approach involves collection of aliquots of soil from 32 locations within each grid cell, followed by the compositing of the aliquots, then further processing prior to sampling the composited soil for laboratory analysis. This process will be performed at 43 grid cells that are part of the operational areas soil investigation. The compositing and processing of the sample would result in loss of any VOCs, if present; therefore, the VOC results for these samples would be meaningless and, accordingly, VOC analysis should not be performed.

The elimination of VOCs from this component of the investigation will not impact attainment of project objectives because there are approximately 15 soil borings across the operation area where VOCs will be collected from the 0.5 to 2 feet below ground surface and 10 to 12 feet below ground surface intervals. In addition, the soil vapor survey and monitoring wells both within and downgradient of the operational area will provide indications of any VOCs that would warrant further investigation.

The Standard Operating Procedure (SOP) 5.12 for Collection of Soil Samples for Laboratory Analysis using Incremental Sampling Methodology (ISM) was revised to include the sampling approach agreed upon by EPA, CDM Smith, and Roux, and as documented in Phase I SAP Field Modification #4.

Duration of Modification (Check one):

☐ Temporary

Date(s) _____

Sample Numbers Affected _____

☒ Permanent (Proposed Text Modification Section) Effective Date: 7/21/2016

Proposed Text Modifications in Associated Document:

The text modification is shown in red below.

Text from Section 4.2.6: Soil samples collected using ISM will be analyzed for the same analyses described in Section 4.6.1, including 20% of the surface samples sieved and analyzed for lead, with the exception that the ISM samples will not be analyzed for VOCs.

Data Quality Indicator (check one) – Please reference definitions on next page for direction on selecting data quality indicators:

☒ **Not Applicable** ☐ **Reject** ☐ **Low Bias** ☐ **Estimate** ☐ **High Bias** ☐ **No Bias**

Roux Project Manager Approval: Andrew Baris Date: 7/21/2016
(Roux RI/FS Project Manager or designate)

EPA Review and Approval: Mike Cirian Date: _____
(USEPA RPM or designate)

DATA QUALITY INDICATOR DEFINITIONS

Reject – Samples associated with this modification form are not useable. The conditions outlined in the modification form adversely affect the associated sample to such a degree that the data are not reliable.

Low Bias – Samples associated with this modification form are useable, but results are likely to be biased low. The conditions outlined in the modification form suggest that associated sample data are reliable, but estimated low.

Estimate – Samples associated with this modification form are useable, but results should be considered approximations. The conditions outlined in the modification form suggest that associated sample data are reliable, but estimates.

High Bias – Samples associated with this modification form are useable, but results are likely to be biased high. The conditions outlined in the modification form suggest that associated sample data are reliable, but estimated high.

No Bias – Samples associated with this modification form are useable as reported. The conditions outlined in the modification form suggest that associated sample data are reliable as reported.