June 13, 2019
File No. 25218175.00

Mr. Mike Schmoller
Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Fitchburg, WI 53711

Subject: Additional Site Investigation Workplan
Former Burke Wastewater Treatment Plant Property
1401 Packers Ave., Madison, Wisconsin

Dear Mr. Schmoller:

SCS Engineers (SCS) has prepared this Additional Site Investigation Workplan, on behalf of Madison Gas and Electric (MG&E), to address the potential for per- and polyfluoroalkyl substances (PFAS) contamination at the former Burke Wastewater Treatment Plant site (**Figure 1**). The proposed scope of work includes collecting groundwater samples from on-site monitoring wells and collecting samples of dried (solid) sludge for PFAS from four soil borings.

Previous Groundwater Sampling

SCS collected groundwater samples from on-site monitoring wells, TW-1 through TW-4, using low-flow methods in February 2019 for analysis of PFAS. The wells were purged and sampled using a peristaltic pump with dedicated high-density polyethylene (HDPE) downhole tubing and Masterflex® C-Flex® (thermoplastic elastomer) pump tubing to minimize the amount of sampling equipment in contact with the water, and also to minimize the potential for cross contamination of the samples. Sampling materials, techniques, and decontamination procedures were conducted in general conformance with the Michigan Department of Environmental Quality General PFAS Sampling Guidance and Groundwater Sampling Guidance (**Attachments A** and **B**). The same materials, techniques, and decontamination procedures will be used for this sampling event.

Proposed Work

The proposed scope of work includes sampling groundwater from monitoring wells TW-1 through TW-4 and Truax monitoring well MW-10, and dried sludge from four soil borings for analysis of PFAS (**Figure 2**). Groundwater and soil sampling will be conducted in a manner in which to minimize the risk of cross-contamination that could occur from sampling and drilling equipment, field clothing and personal protective equipment, personal hygiene and personal care products, food packaging, and the environment itself. Groundwater and soil sampling procedures will follow the Michigan Department of Environmental Quality Groundwater and Soil PFAS Sampling Guidance's documents that are provided in **Attachments B** and **C** respectively.

Personnel sampling groundwater and soil for PFAS will wear powderless nitrile gloves at all times during the sampling event and be free of personal skin products, such as sunscreen and bug spray. Clothing advertised as waterproof, dirt, and or stain repellant will not be worn during the sampling event. Nitrile gloves will be continuously changed to prevent cross-contamination. Pre-packaged food

will not be allowed during the sampling event. All equipment that produces fumes will be stationed downwind of the sampling points.

Groundwater Sampling

Monitoring wells TW-1, TW-2, TW-3, TW-4, and Truax well MW-10 will be re-sampled for PFAS analysis. The well locations are provided on **Figure 2**.

Depth to water will be collected from each well but not total depth as to minimize the amount of equipment in contact with groundwater. The water level indicator will be rinsed with an Alconox solution and laboratory provided PFAS-free water immediately before collecting a depth to water measurement. Dedicated bailers will be removed after depth to water measurement and set aside on PFAS-free plastic sheeting.

Sampling will be performed using a peristaltic pump and low-flow techniques. Specific conductivity, temperature, dissolved oxygen, pH, turbidity, and oxidation-reduction potential will be measured until stabilization is achieved. Each well will be sampled using new high-density polyethylene tubing. Tubing will remain in its original package until it is lowered into the well. Tube cutters will be rinsed with Alconox solution and laboratory provided PFAS-free water immediately before cutting the desired length of tubing. Extra caution will be taken when collecting the sample; sample containers will be opened immediately before and capped immediately after sample collection, and the sampling tubing will not come into contact with the sample container. All groundwater sample containers will be double-bagged in Ziploc® bags and remain bagged upon analysis. Samples will be shipped overnight to a Wisconsin Department of Natural Resources (WDNR) certified laboratory.

Wells will be sampled starting with those expected to be the cleanest (TW-3, TW-2, Truax MW-10, TW-4, and TW-1). Monitoring well TW-1 purges dry; therefore, this well will be purged first and sampled last to ensure enough time for recharge. Purge water will be discharged to the ground. One equipment blank and one field blank will be collected prior to sampling the first monitoring well using laboratory supplied PFAS-free water. The equipment blank will be collected through a new piece of high-density polyethylene tubing using the peristaltic pump. If an atmospheric source of PFAS is suspected, the field blank will be collected downwind of the suspected source.

Soil Sampling

SCS will advance up to four soil borings to an approximate depth of 25 feet below ground surface (bgs) within the locations of dried sludge. The proposed soil borings are provided on **Figure 2**. The borings will be installed by Geoprobe® and soils will be screened using a photoionization detector (PID) and classified according to the Unified Soil Classification System (USCS). One sample of dried sludge collected from each boring will be analyzed for PFAS. Soil borings will be abandoned following NR 141, and soil cuttings will be thin spread on site.

Soils will be collected using clear PVC liner tubes. Drilling equipment will be decontaminated with Alconox solution and triple-rinsed with PFAS-free water prior to drilling each soil boring. PFAS-free plastic sheeting will cover the surface used during the logging and sampling of soil, and sheeting will be replaced at each sample location. Soil samples will be jarred immediately upon collection, and all sample containers will be double-bagged in Ziploc® bags prior to shipment, and remain bagged until analysis. One equipment blank will be collected prior to drilling the first soil boring using laboratory

supplied PFAS-free water. The equipment blank will be collected through the clear PVC core liner supplied by the driller.

Schedule

Our proposed schedule is as follows:

Task	Timeline
Sample groundwater and soil	July 2019
Report Groundwater and Soil Results to WDNR	August 2019

Please let us know if you have any questions regarding this proposed workplan by contacting Eric at 608-216-7341 or eoelkers@scsengineers.com.

Sincerely,

Jackie Rennebohm
Staff Scientist
SCS Engineers

Eric Oelkers, PG
Project Manager
SCS Engineers

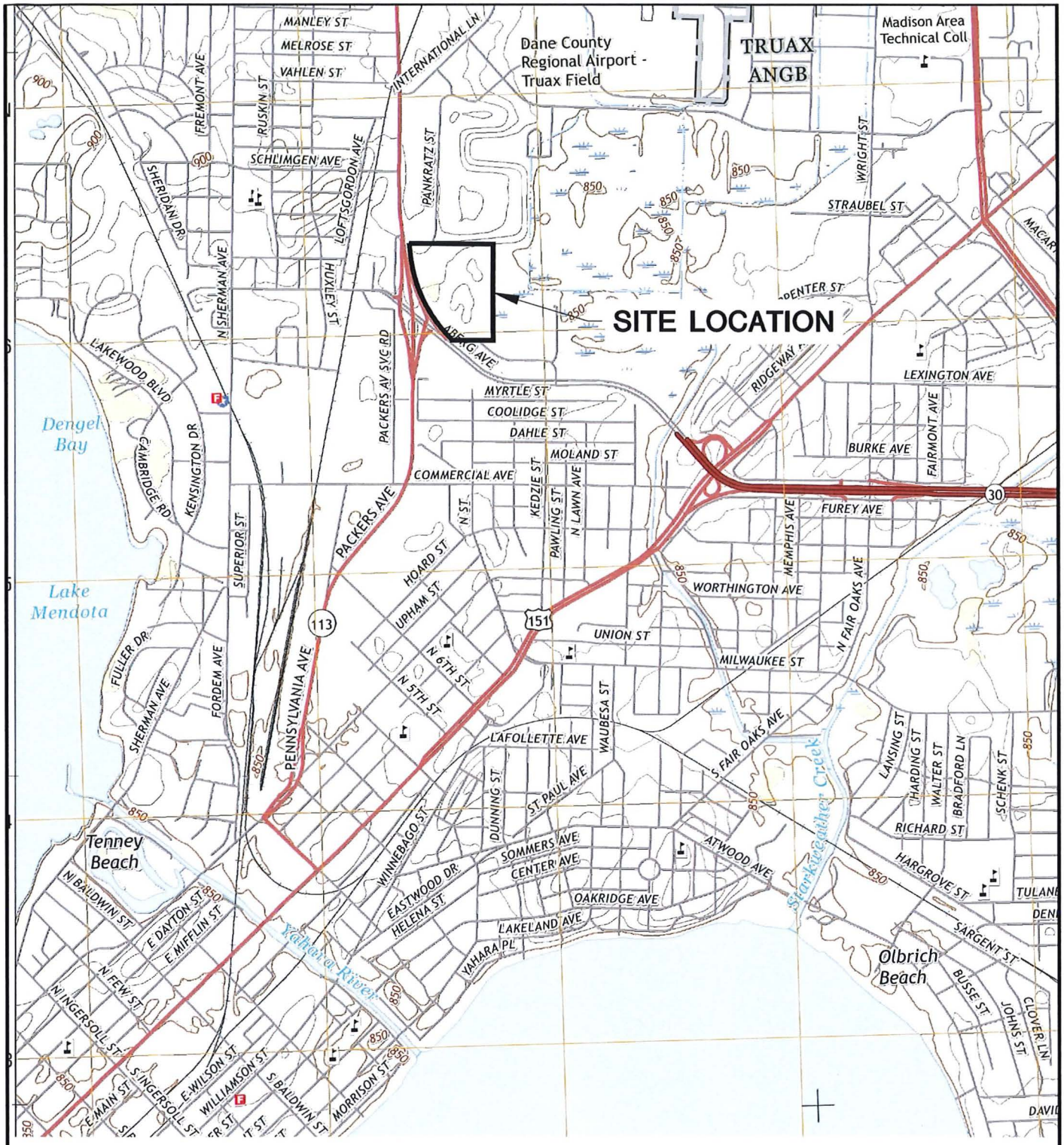
JR/AJR_lmh/EO

cc: Jeff Jaeckels, MG&E
Kyle Kramer, MG&E

Encl. Figure 1 - Site Location Map
Figure 2 - Site Plan
Attachment A - Michigan Department of Environmental Quality General PFAS Sampling Guidance
Attachment B - Michigan Department of Environmental Quality Groundwater PFAS Sampling Guidance
Attachment C - Michigan Department of Environmental Quality Soil PFAS Sampling Guidance

I:\25218175.00\Deliverables\Workplan\190613_Schmoller_Workplan.docx

Figures



N

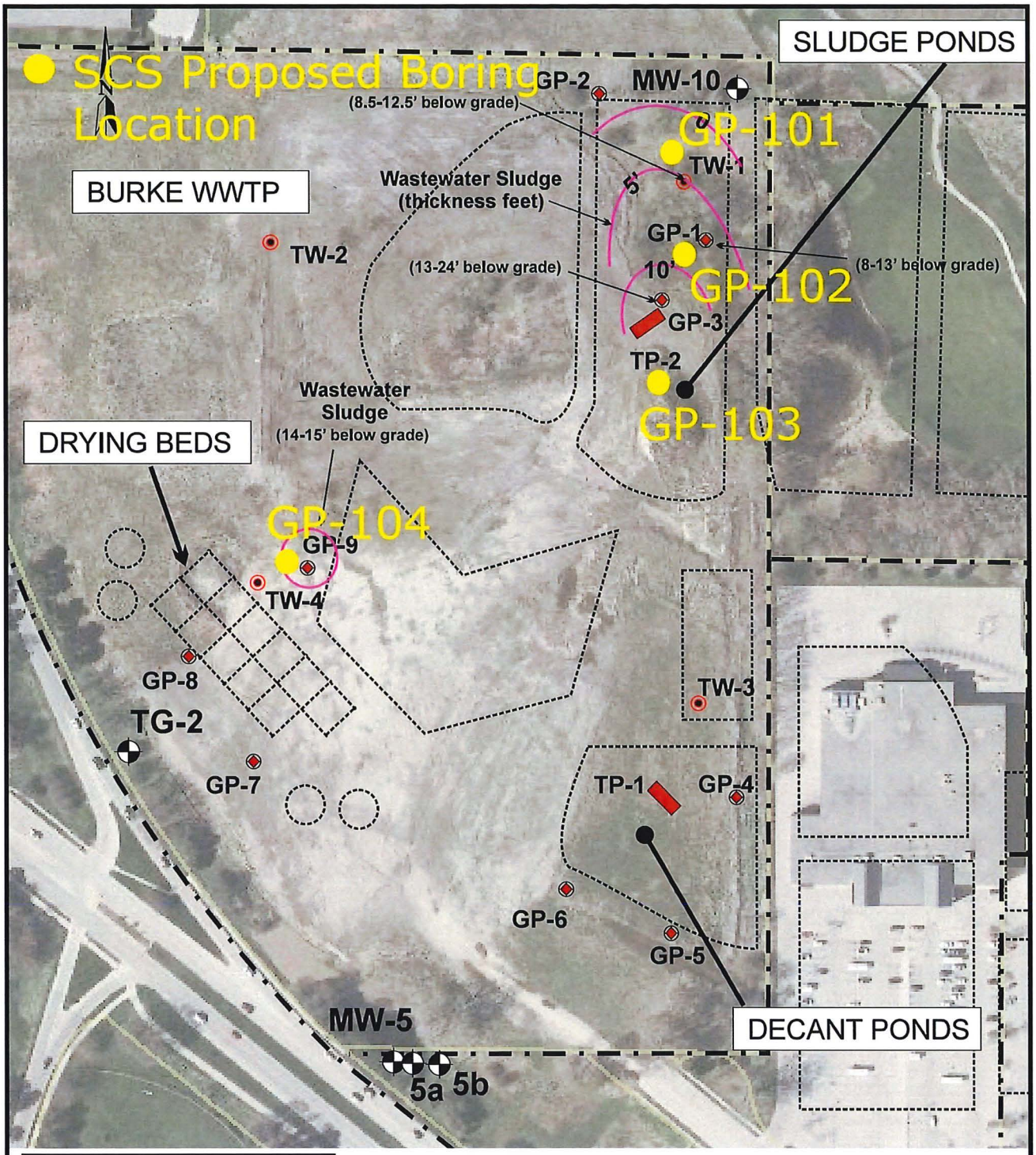
MADISON EAST QUADRANGLE
WISCONSIN–DANE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)
2016
SCALE: 1" = 2,000'

CLIENT	MADISON GAS AND ELECTRIC 120 S. BALDWIN ST. MADISON, WI, 53703	SITE	FORMER BURKE WWTP 1401 PACKERS AVENUE MADISON, WISCONSIN
			SITE LOCATION MAP

PROJECT NO.	25218175.00	DRAWN BY:	KP	ENGINEER	SCS ENGINEERS 2830 DAIRY DRIVE MADISON, WI 53718-6751 PHONE: (608) 224-2830
DRAWN:	10/24/18	CHECKED BY:	NK		FIGURE 1
REVISED:	05/09/19	APPROVED BY:			

I:\25218175.00\Drawings\Site Location.dwg, 5/9/2019 1:10:54 PM

Figure 2. Site Plan



LEGEND

TW-1 - Monitoring Well (Seymour 2018)

MW-6 - Monitoring Well (Former Truax Landfill)

0 200' 400'

1 INCH = 200 FEET
SCALE IS APPROXIMATE

FILE/PATH: D:\ PROJECTS\RUEDEBUSCH\ BurkeWWTP-layout.cdr
DATE: 01/08/2019
PREPARED: MDF APPROVED:
SOURCE: Dane County Public Mapping - 2017 Aerial
REA Basemap 2002

SEYMOUR ENVIRONMENTAL SERVICES, INC.

LOCATIONS OF WASTEWATER SLUDGE
Burke Wastewater Treatment Plant
1401 Packers Avenue
Madison, Wisconsin

FIGURE 4

Attachment A

Michigan Department of Environmental Quality
General PFAS Sampling Guidance

GENERAL PFAS SAMPLING GUIDANCE

This document contains an introduction to PFAS, biosecurity recommendations, and general recommendations to decrease the possibility of cross-contamination.

Michigan Department of Environmental Quality

Revised 10/16/2018

GENERAL PFAS SAMPLING

Guidance

CONTENTS

Acronyms

Acronyms used throughout the **General PFAS Sampling Guidance** document and/or each sampling guidance are as follows:

AFFF – Aqueous film forming foam
CAS Number – Chemical abstracts service number
COC – Chain of Custody
DEPA – Danish Environmental Protection Agency (Denmark)
EINECS – European List of Notified Chemical Substances (European Union)
ENCS – Existing and New Chemical Substances Inventory (Japan)
ETFE – Ethylene-tetrafluoroethylene
FCMP – Fish Contaminant monitoring program
FCSV – Fish consumption screening values
FDA – Food and Drug Administration (United States of America)
FEP – Fluorinated ethylene propylene
HASP – Health and Safety Plan
HDPE – High-density polyethylene
IECSC – Inventory of Existing Chemical Substances Produced or Imported in China
ITRC – Interstate Technology & Regulatory Council
KECI – Korea Existing Chemicals Inventory (South Korea)
KEMI – Swedish Chemical Agency (Sweden)
LDPE – Low-density polyethylene
LHA – Lifetime Health Advisory (United States Environmental Protection Agency)
MDEQ – Michigan Department of Environmental Quality
MDHHS – Michigan Department of Health and Human Services
MPART – Michigan PFAS Action Response Team
MSDS – Material Safety Data Sheet (former reference)
ng/L – Nanograms per liter
NZIoC – New Zealand Inventory of Chemicals (New Zealand)
PCPs – Personal care products
PID – Photoionization detector
PFAA – Perfluoroalkyl acids
PFAS – Per- and Polyfluoroalkyl Substances
PFC – Polyfluorocarbons
PFCA – Perfluoroalkyl carboxylic acids
PFOA – Perfluorooctanoic acid
PFOS – Perfluorooctanesulfonic acid
PFPE – Perfluoropolyethers
PFSA – Perfluoroalkyl sulfonic acids
PICCS – Philippine Inventory of Chemicals and Chemical Substances (Philippines)
ppb – Parts per billion
PPE – Personal protection equipment
ppt – Parts per trillion
PTFE – Polytetrafluoroethylene
PVC – Polyvinyl chloride
PVDF – Polyvinylidene fluoride
PVF – Polyvinyl fluoride
QA/QC – Quality assurance/quality control
QAPP – Quality Assurance Project Plan
OECD – Organization for Economic Cooperation and Development
SDS – Safety Data Sheet
SWAS – Surface Water Assessment Section (MDEQ)
TSCA – Toxic Substances Control Act (United States of America)
USEPA – United States Environmental Protection Agency
UV – Ultraviolet
VOC – Volatile organic compounds
WRD – Water resources division (MDEQ)

Disclaimer

The Michigan Department of Environmental Quality (MDEQ) intends to update the information contained within this PFAS Sampling Guidance document as new information becomes available. The user of this PFAS Sampling Guidance is encouraged to visit the Michigan PFAS Action Response Team webpage (www.michigan.gov/PFASresponse) to access the current version of this document.

1. Introduction

Per- and polyfluoroalkyl Substances (PFAS) are a class of **emerging contaminants** composed of more than 3,000 human-made, fluorinated, organic chemicals (Buck et al., 2011, Wang et al., 2017). The actual number of compounds is continuously changing, as some PFAS are no longer produced due to regulatory and voluntary actions, while new ones are created as alternatives. The carbon-fluorine bond that exists in PFAS is one of the strongest bonds in nature, they are tough to break and are resistant to thermal, chemical, and biological degradation.

NOTE: Emerging Contaminants are chemicals and materials in the environment and present real or potential human health or environmental risks, and either...

- Do not have peer-reviewed human health standards
  or:
- Standards/regulations are evolving due to new science, new laboratory analytical capabilities, and new knowledge about the chemicals.

Due to their unique chemical properties, various PFAS can lower surface tension (act as surfactants), are oil-repelling (oleophobic), and are water-repelling (hydrophobic), yet are also relatively water soluble. They have been used extensively in many industries worldwide for a wide variety of applications. PFAS were first invented in the late 1930's and commercially used from the 1940's as non-stick coatings. PFAS continued to be used in many industries and various products as more PFAS were developed with unique chemical properties. Some of the documented PFAS uses are in hydraulic fluids, biocides, construction products, fire-fighting foams, household products, wetting and mist suppressing agents, surfactants for oil and natural gas recovery enhancement, polymerization agents, low-friction bearings and seals, insulators, cables, wires, protective coatings for a wide variety of materials, nonstick coatings, surgical patches, cardiovascular grafts, implants, oil and water repellent coatings for a wide range of materials such as paper and cardboard packaging products, carpets, leather products, and textiles (OECD, 2013). The presence of PFAS in these materials is a potential source of environmental concern and cross-contamination.

The probability of false positives is relatively high during PFAS sample collection due to the potential for many sources of cross-contamination, combined with low laboratory detection limits (nanograms per liter (ng/L) or parts per trillion (ppt)). There are many products that could be found in the sampling environment, that have not been documented to either contain or not contain PFAS, and may come into contact with the samples, introducing causing cross-contamination.

The United States Environmental Protection Agency (USEPA) has established a Lifetime Health Advisory (LHA) for Perfluorooctanoic acid (PFOA) and Perfluorooctanesulfonic acid (PFOS), separately or combined, of 70 ppt. The MDEQ cleanup criteria protective of groundwater used for drinking water purposes is also 70 ppt for PFOS and PFOA, individually or combined. The MDEQ has also promulgated a standard under Rule 57 for PFOS of 11 ppt for surface water that is used as a drinking water source and 12 ppt for surface water that is not used as a drinking water source.

●- Prohibited ■- Allowable ▲- Needs Screening

2. Purpose and Objectives

The purpose of this document is to provide guidance and information to staff who will:

- Collect or handle PFAS environmental samples.
- Perform subsurface activities such as soil borings and/or well installation or well abandonment at PFAS sites.

This document is intended to supplement the MDEQ media-specific PFAS sampling guidance documents and is a resource for PFAS sampling.

The objectives of this document are as follows:

- Provide guidance on avoiding PFAS cross-contamination during sampling.
- Improve sampling consistency and data quality.
- Provide guidance to MDEQ staff and contractors.

Because PFAS are emerging contaminants and information about their use in various materials is still not available; the MDEQ will update this document as new information becomes available.

NOTE: This guidance does not include specific information for sampling environmental media and should not be used to replace specific sampling guidance documents required for use by MDEQ staff.

3. Farm Biosecurity

In the event PFAS sampling occurs on or near a farm, staff need to follow the requirements in this document when conducting sample collection, to reduce the likelihood of transporting animal diseases.

3.1 Scheduling

To avoid cross-contamination from previous sampling locations, it is preferable that staff visit only one farm in a day.

3.2 Before Sampling

Staff should review **Section 4.2.4. Field Clothing and Personal Protective Equipment (PPE)** before going into the field.

Staff must have a clean vehicle, clean clothing, and clean boots to visit the sampling location. Before arriving at the farm, staff should call the owner of the farm to indicate they will be arriving shortly and ask if there are any additional biosecurity requirements for their farm. Once at the farm, staff should park away from any animals and barns; preferably in a designated visitor area or on concrete.

Immediately before exiting the vehicle, place disposable PFAS-free boot covers over boots. (*NOTE: Disposable boot covers can be slippery, especially in icy/snowy conditions.*)

3.3 While Sampling

Staff should not approach animal areas unless necessary for testing. If access to an animal area is needed, staff should always be accompanied by farm personnel.

3.4 After Sampling

Dispose of used disposable boot covers at the facility if possible; otherwise, place in a plastic bag, seal and place in the vehicle trunk to dispose of properly later.

4. General PFAS Sampling

The following sections discuss technical issues such as the need to use PFAS-free water; information about PFAS-free clothing and PPE; and laboratory issues that should be considered when sampling for PFAS.

4.1 Sampling Objectives

Before conducting any PFAS sampling, it is recommended that a project-specific Quality Assurance Project Plan (QAPP) should be developed. The QAPP must meet MDEQ policy and should include the analyte list, method of analysis, environmental matrices, and reporting limits, which are based on the project objectives. All of these considerations will be discussed in more detail in this guidance document.

4.2 PFAS Cross-Contamination Potential Sources

Potential sources of PFAS cross-contamination in the typical sampling environment include water used during drilling or decontamination, materials used within the sampling environment, sampling equipment, field clothing and personal protective equipment (PPE), sun and biological protection products, personal hygiene and personal care products (PCPs), food packaging, and the environment itself.

The materials associated with sampling that have the potential for PFAS cross-contamination have been divided into three major groups:

- Prohibited (●) identifies items and materials that should not be used when sampling. It is well documented that they contain PFAS or that PFAS are used in their manufacture.

- Allowable (■) identifies items and materials that have been proven not to be sources of PFAS cross contamination and are considered allowable for sampling.

- Needs Screening (▲) identifies items and materials that have the potential for PFAS cross-contamination due to a lack of scientific data or statements from manufacturers to prove otherwise. These items and materials are further sub-divided into two categories:

    - **Category 1:** Items and materials that <u>will come in direct contact</u> with the sample. These should not be used when sampling unless they are known to be PFAS-free, by collecting an equipment blank sample prior to use.

    - **Category 2:** Items and materials that <u>will not come in direct contact</u> with the sample. These should be avoided, if possible, unless they are known to be PFAS-free by collecting an equipment blank sample prior to use.

All of the materials or items discussed in each of the MDEQ's PFAS Sampling Guidance Documents will be divided into ● Prohibited ■ Allowable, or ▲ Needs Screening. Several examples of prohibited and allowable materials and materials that need screening are listed in the **MDEQ PFAS Sampling Quick Reference Field Guide** at the end of this document. Also, materials and items that are specific to a particular environmental media or sampling method will be thoroughly explained in that media's sampling guidance document (such as peristaltic pumps for groundwater sampling).

NOTE: If recommended PPE will be used during sampling, **Category 2** materials are not expected to be a source of cross-contamination as long as they do not come into contact with the samples.

●- Prohibited ■- Allowable ▲- Needs Screening

Please note that at this time no published research is available that documents the use of various materials and their effect on sample results. Therefore, a conservative approach is recommended in this guidance based on the evaluation of multiple environmental samples at various PFAS sites. Field sampling occurring during extreme weather (e.g., rainfall, snowfall, or extreme heat) should be conducted while wearing the appropriate clothing that will not pose a risk for cross-contamination but will also ensure the safety of the field personnel.

4.2.1 PFAS-Free Water

The term PFAS-free water is defined here as water that does not contain significant concentrations of any compound in a specific PFAS analyte list that is being analyzed at a project-defined level. The significant concentrations depend on project data quality objectives and could, for instance, be less than the laboratory reporting limit, <1/2 the limit of quantitation, or other defined criteria for the specific PFAS compound of interest (ITRC, 2017).

NOTE: The confirmation of PFAS-free water should always be performed prior to the commencement of work. Site or public water supplies have been identified in many instances to contain detectable levels of PFAS.

One important consideration for each project is to identify a PFAS-free water source to use for decontamination of sampling and drilling equipment when applicable. The decontamination of sampling tools or small equipment parts can be performed using laboratory-supplied verified PFAS-free water. Other water can only be used for decontamination purposes if it has been analyzed and shown to be PFAS-free as defined for the project.

4.2.2 Materials Screening

Materials screening should be performed during the Health and Safety Plan (HASP) and QAPP development or the planning phase of sampling programs. The screening should be performed on all of the items and materials that are expected to come into contact with the samples and defined as **Category 1**.

Material screening should include a review of Safety Data Sheets (SDSs; formerly Material SDS [MSDSs]). Make sure the review uses current SDSs, because the actual composition of a particular item or material may have changed over time without changing the actual item or material name. All products from the United States or abroad should be screened. Text fragments such as "perfluoro," "fluoro," or "fluorosurfactant" may identify the use of PFAS in specific items or materials.

NOTE: Manufacturers can change the chemical composition of any product. As a result, equipment blank samples should be collected for all materials that will come into direct contact with the sample media, regardless of what category they might be in, to confirm they are "PFAS-free", i.e. will not contaminate samples at detectable levels. **There is no guarantee that materials in the 'Allowable category will always be PFAS-free.**

Some countries have official national lists of industrial chemicals defined by regulations, such as:

- Toxic Substances Control Act (TSCA) in the United States.
- European List of Notified Chemical Substances (EINECS), as well as substances pre-registered under the Registration, Evaluation, Authorization, and restriction of Chemicals (REACH) in the European Union.
- Swedish Chemical Agency (KEMI) in Sweden.

●- Prohibited ■- Allowable ▲- Needs Screening

- Domestic Substances List (DSL) in Canada.
- Inventory of Existing New Chemical Substances Produced or Imported in China (IECSC)
- Existing and New Chemical Substances Inventory (ENCS) in Japan.
- Korea Existing Chemicals Inventory (KECI) in South Korea.
- New Zealand Inventory of Chemicals (NZIoC) in New Zealand.
- Philippine Inventory of Chemicals and Chemical Substances (PICCS) in the Philippines.

The information available on these lists includes the chemical names and various identity numbers, which is usually the Chemical Abstracts Service number (CAS Number) (KEMI, 2015). The lists may not contain a substantial amount of information because of laws in regards to proprietary information, which gives the suppliers the right to not name newly developed chemicals. The information is not always sufficient to identify if the items or materials contain PFAS, as many of the PFAS do not have an assigned CAS Number at this time (KEMI, 2015). The most recent summary conducted by the Organization for Economic Co-operation and Development (OECD) identified 4,730 PFAS-related CAS numbers (OECD, 2018).

Sometimes manufacturers provide information about their products online or upon request, which may indicate if PFAS were used in the manufacturing of a particular item or material.

4.2.3 Sampling Equipment

The actual list of PFAS-containing materials potentially encountered onsite will change based on the specific sampled media and site-specific sampling conditions. Do not use any equipment that contains any known fluoropolymers. Consider all of the following:

- Do not use polytetrafluoroethylene (PTFE) that includes the trademark Teflon® and Hostaflon®, which can be found in many items, including but not limited to the lining of some hoses and tubing, some wiring, certain kinds of gears, and some objects that require the sliding action of parts.
- Do not use Polyvinylidene fluoride (PVDF) that includes the trademark Kynar®, which can be found in many items, including but not limited to tubing, films/coatings on aluminum, galvanized or aluminized steel, wire insulators, and lithium-ion batteries.
- Do not use Polychlorotrifluoroethylene (PCTFE) that includes the trademark Neoflon®, which can be found in many items, including but not limited to valves, seals, gaskets, and food packaging.
- Do not use Ethylene-tetrafluoroethylene (ETFE) that includes the trademark Tefzel®, which can be found in many items, including but not limited to the wire and cable insulation and covers, films for roofing and siding, liners in pipes, and some cable tie wraps.
- Do not use Fluorinated ethylene propylene (FEP) that includes the trademarks Teflon® FEP and Hostaflon® FEP, and may also include Neoflon®, which can be found in many items, including but not limited to the wire and cable insulation and covers, pipe linings, and some labware.
- Do not use low-density polyethylene (LDPE) for any items that will come into direct contact with the sample media. LDPE can be found in many items, including but not limited to containers and bottles, plastic bags, and tubing.
    - **However**, LDPE may be used if an equipment blank has confirmed it to be PFAS-free. LDPE does not contain PFAS in the raw material but may contain PFAS cross-contamination from the manufacturing process.

●- Prohibited ■- Allowable ▲- Needs Screening

- ■ LDPE bags (e.g., Ziploc®) that do not come into direct contact with the sample media and do not introduce cross-contamination with samples may be used.
- ■ Use materials that are either made of high-density polyethylene (HDPE), polypropylene, silicone, or acetate.
- ■ Glass bottles or containers may be used if they are known to be PFAS-free, however, PFAS have been found to adsorb to glass, especially when the sample is in contact with the glass for a long period of time (e.g. being stored in a glass container). If the sample comes into direct contact with the glass for a short period of time (e.g. using a glass container to collect the sample, then transferring the sample to a non-glass sample bottle), the adsorption is minimal.
- ■ Powderless nitrile gloves (which can be found at some hardware and major retail outlets).
- ▲ Latex gloves should be screened before use.
- ▲ Some sampling guidance documents allow the use of aluminum foil provided the shiny side is placed away from the sample (e.g., fish tissue sampling guidance). As a precaution, MDEQ recommends that aluminum foil not is used unless equipment blank samples confirm it is PFAS-free.

4.2.4 Field Clothing and Personal Protective Equipment (PPE)

Any field planning and mobilization effort should address the physical, chemical, and biological hazards associated with each PFAS site. The mitigation of potential risks may be documented in a site-specific HASP or a QAPP. Due to the extensive use of PFAS in many industries and products, PPE may contain PFAS. During PFAS investigation, PPE containing PFAS should be avoided to prevent cross-contamination. The development of the HASP or QAPP should consider these factors before mobilization in the field. All HASPs or QAPPs need to address the concern of potential exposure of staff to PFAS through PPE.

Personal safety is paramount. The safety of staff should not be compromised by fear of PFAS containing materials without any scientific basis. Any deviation from this guidance, including those necessary to ensure the health and safety of sampling personnel, must be recorded in field notes and discussed in the final report.

Globally, protective coatings for textiles are estimated to be about 50 percent of the total use of PFAS (DEPA, 2015). Due to its unique properties of water and oil repellency, PFAS has been used to coat various clothing (i.e., pants, jackets, and t-shirts) and leather products (i.e., boots, shoes, and jackets). Many of these types of clothing and PPE have the potential to be used in the sampling environment.

NOTE: The Danish Ministry of the Environment identified alternative polymer technology as being PFAS-free. Products treated with this technology are water- resistant, but not oil and dirt repellent to the same extent as products treated with PFAS- based agents (DEPA, 2015).

While preparing for sampling, particular focus should be made on clothing that has been advertised as having waterproof, water-repellant, or dirt and/or stain resistant characteristics. These types of clothing are most likely to have had PFAS used in their manufacturing.

Field Clothing and PPE that should be avoided (●) in the immediate sampling environment include the following:

●- Prohibited ■- Allowable ▲- Needs Screening

- Do not use clothing that has been washed with fabric softener which may contain PFAS.
- Do not use clothing that has been made with or washed with water, dirt, and/or stain resistant chemicals.
- Do not use clothing chemically treated for insect resistance and ultraviolet protection (See **Section 4.2.5** on biological hazards).
- Do not use clothing or PPE items that have any of the brand or product names that have been found to contain PFAS by the Danish Ministry of the Environment and presented in **Table 1** below (DEPA, 2015).

Field Clothing and PPE that are allowable (■) to wear within the immediate sampling environment include the following:

- Powderless nitrile gloves.
- Polyvinyl chloride (PVC) or wax-coated fabrics.
- Neoprene.
- Any boots made of polyurethane and/or PVC. If the HASP requires a specific type of boot such as (steel-toed), and PFAS-free cannot be purchased, PFAS- free over-boots may be worn. The overboots must be put on, and hands washed after putting the overboots on before the beginning of sampling activities. Overboots may only be removed in the staging area and after the sampling activities have been completed.
- Synthetic and natural fibers (preferably cotton) that are well laundered (more than six times with no fabric softener) clothes and cotton overalls.

NOTE: There could be many PPE materials used during various sampling events, including hard hats and safety glasses. All clothing and PPE should be evaluated prior to sampling.

Field Clothing and PPE that must be evaluated (▲) before wearing within the immediate sampling environment include the following:

- Latex gloves.
- Water resistant or stain-treated clothing and PPE.
- Tyvek suits and clothing that contain Tyvek® (USEPA PFAS sampling guidance from USEPA Region 2 prohibits the use of Tyvek; available product information suggests Tyvek® may be used if required. Coated Tyvek® requires further evaluation; therefore, MDEQ recommends the collection of an Equipment Blank before Tyvek® use).

●- Prohibited ■- Allowable ▲- Needs Screening

Table 1 below provides a list of prohibited field clothing (DEPA, 2015). However, the manufacturer and/or vendor for the field clothing and/or PPE should be contacted to confirm that these brand or product names still contain PFAS. There have been instances where manufacturers have kept the same brand and/or product name but have changed the chemicals used during the manufacturing of a particular item.

Table 1. Prohibited Field Clothing and PPE Brand and Product Names

● Prohibited Materials[1] (DEPA, 2015)	
Advanced Dual Action Teflon® fabric protector.	Release Teflon®
Repel Teflon® fabric protector	High-Performance Release Teflon®
High performance Repel Teflon® fabric protector	Ultra Release Teflon®
NK Guard S series	GreenShield®
Tri-Effects Teflon® fabric protector	Lurotex Protector RL ECO®
Oleophobol CP®	Repellan KFC®
Rucostar® EEE6	UnidyneTM
Bionic Finish®	RUCO-GUARD®
RUCOSTAR®	RUCO-COAT®
RUCO-PROTECT®	RUCOTEC®
RUCO®	Resist Spills™
Resists Spills and Releases Stains™	Scotchgard™ Fabric Protector

[1]This list is not considered to be a complete listing of prohibited materials. All materials should be evaluated before use during sampling.

4.2.5 Sun and Biological Protection

Because biological hazards (sunburn, mosquitos, ticks, etc.) may be encountered during sampling, the elimination of specific clothing materials or PPE (sunscreens and insect repellants) could pose a health and safety hazard to staff.

The safety of staff should not be compromised by fear of PFAS containing materials without any scientific basis. Personal safety is paramount. Any deviation from this guidance, including those necessary to ensure the health and safety of MDEQ staff, should be recorded in field notes and discussed in the final report.

Prolonged sun exposure will require sunscreens, which may have included PFAS in their manufacture. Protection against insects may require the use of insect repellant. **Table 2** contains a detailed list of sunscreens and insect repellants that have been analyzed and found to be PFAS-free as of the date of this document. Note that this is not a comprehensive list of allowable insect repellants or sunscreens; other products may meet the requirements for use. Listing or omission of any product does not imply endorsement or disapproval. Also, there is no guarantee that these products will always remain PFAS free.

NOTE: Sunscreens and insect repellants must be evaluated on a case-by-case basis. Refer to **Section 4.6 Quality Control Samples** for details on collecting equipment blanks.

The MDEQ recommends that additional sunscreens and insect repellents be treated as (▲) Needs Screening and should be evaluated before use.

- ● Sunscreens and insect repellants should not be applied near the sample collection area.
- ■ Hands should be well washed after application or handling of these products, and afterwards, powderless nitrile gloves should be worn.

●- Prohibited ■- Allowable ▲- Needs Screening

Table 2. Sunscreen and Insect Repellents[1]

■ Allowable Insect Repellants	
Photos	**Insect Repellent Spray**
	• OFF Deep Woods • Sawyer Permethrin

■ Allowable Sunscreens	
Photos	**Sunscreens**
	• Banana Boat Sport Performance Sunscreen Lotion Broad Spectrum SPF 30. • Meijer Sunscreen Lotion Broad Spectrum SPF 30. • Neutrogena Ultra-Sheer Dry-Touch Sunscreen Broad Spectrum SPF 30.

■ Allowable Sunscreens
• Banana Boat for Men Triple Defense Continuous Spray Sunscreen SPF 30
• Banana Boat Sport Performance Coolzone Broad Spectrum SPF 30
• Banana Boat Sport Performance Sunscreen Lotion Broad Spectrum SPF 30
• Banana Boat Sport Performance Sunscreen Stick SPF 50
• Coppertone Sunscreen Lotion Ultra Guard Broad Spectrum SPF 50
• Coppertone Sport High-Performance AccuSpray Sunscreen SPF 30
• Coppertone Sunscreen Stick Kids SPF 55
• L'Oréal Silky Sheer Face Lotion 50+
• Meijer Clear Zinc Sunscreen Lotion Broad Spectrum SPF 15, 30 and 50
• Meijer Wet Skin Kids Sunscreen Continuous Spray Broad Spectrum SPF 70
• Neutrogena Beach Defense Water + Sun Barrier Lotion SPF 70
• Neutrogena Beach Defense Water + Sun Barrier Spray Broad Spectrum SPF 30
• Neutrogena Pure & Free Baby Sunscreen Broad Spectrum SPF 60+
▲ Materials That Require Screening
Sunscreens: Alba Organics Natural Sunscreen, Yes To Cucumbers, Aubrey Organics, Jason Natural Sun Block, Kiss My Face, and baby sunscreens that are "free" or "natural."
Insect Repellents: Jason Natural Quit Bugging Me, Repel Lemon Eucalyptus Insect repellant, Herbal Armor, California Baby Natural Bug Spray, Baby Ganics.
Sunscreen and Insect Repellent: Avon Skin So Soft Bug Guard Plus – SPF 30 Lotion.

[1]This table is not considered to be a complete listing of allowable materials and materials that require screening. All materials should be evaluated before use during sampling. Some of the sunscreen and insect repellent testing has been performed using a PFAS screening Method known as Particle Induce Gamma-Ray Emission (PIGE). The use of approved gloves should always be used, and the sample should never come into contact with any of the sunscreen or insect repellent products. An Equipment Blank sample could also be collected to verify the product as PFAS-free.

●- Prohibited ■- Allowable ▲- Needs Screening

If an insect repellant has not been approved and staff needs protection against biting insects:

NOTE: The words "Natural" and/or "Organic" in the product name or to describe it does not mean that it is PFAS-free.

- Tuck pant legs into socks and/or boots to seal the gap between the boots and the pants to reduce the risk of being bitten by ticks.
- Wear well-washed, light-colored clothing to easily see ticks during field activities.
- Light-colored clothing, long sleeves, and large-brimmed hats also prevent sunburn.
- Equipment Blank samples should be collected to verify that the preferred insect repellant or sunscreen is PFAS-free by using the testing procedures identified in **Section 4.6 Quality Control Samples**.

4.2.6 Personnel Hygiene and Personal Care Products (PCPs)

A number of sampling guidance documents recommend that personal hygiene and personal care products (PCPs) (e.g., cosmetics, shampoo, sunscreens, dental floss, etc.) not be used prior to and on the day(s) of sampling because the presence of PFAS in these products has been documented (OECD, 2002, Fujii, 2013, Borg and Ivarsson, 2017). However, if the MDEQ's sampling SOPs are followed, these items should not come into contact with the sampling equipment or the sample being collected. As of the date of this sampling guidance, cross-contamination of samples due to the use of PCPs has not been documented during the collection of thousands of samples. However, field personnel should be aware of the potential of cross-contamination if the sampling equipment or actual samples would come into contact with these products. The following precautions should be taken when dealing with personal hygiene or PCPs before sampling:

- ● Do not handle or apply PCPs in the sampling area.
- ● Do not handle or apply PCPs while wearing PPE that will be present during sampling.
- ■ Move to the staging area and remove PPE if applying personal care products becomes necessary.
- ■ Wash hands thoroughly after the handling or application of PCPs and, when finished, put on a fresh pair of powderless nitrile gloves.

4.2.7 Food Packaging

PFAS has been used by the paper industry as a special protective coating against grease, oil, and water for paper and paperboards, including food packaging since the late 1950s (Trier et al., 2018). PFAS application for food packaging includes paper products that come into contact with food such as paper plates, food containers, bags, and wraps (OECD, 2002). In January 2016, the Food and Drug Administration (FDA) banned the use of PFAS which has eight carbon atoms (such as PFOA and PFOS) or more, in food packaging materials. However, PFOA and PFOS or other eight or more carbon chain PFAS may still be detected in food packaging because of the use of recycled paper which may contain PFAS. Various studies have found up to 57percent detection frequency in food contact materials such as paper (Trier et al., 2011; Rosenmai et al., 2013; Schaider et al., 2017).

NOTE: Short-chain PFAS have not been banned for use in the manufacturing of contact food materials in the United States.

PFAS has been used by the paper industry as a special protective coating against grease, oil, and water for paper and paperboards, including food packaging since the late 1950s (Trier et al., 2018). PFAS application for food packaging includes paper products that come into contact with food such as paper plates, food containers, bags, and wraps (OECD, 2002). Pre-wrapped food or snacks (such as candy bars, microwave popcorn, etc.) must not be in the sampling and staging areas during sampling due to PFAS contamination of the packaging. When staff

requires a break to eat or drink, they should remove their gloves, coveralls, and any other PPE, if worn, in the staging area and move to the designated area for food and beverage consumption. When finished, staff should wash their hands and put on a fresh pair of powderless nitrile gloves at the staging area, before returning to the sampling area.

- ● Do not handle, consume, or otherwise interact with pre-wrapped food or snacks, carry-out food, fast food, or other food items while on-site during sampling.
- ■ Move to the staging area and remove PPE prior to leaving the sampling and staging areas if consuming food on site becomes necessary.

4.3 PFAS Sampling Procedures

4.3.1 Sample Containers, Handling, and Collection

All bottles used for PFAS sampling should come from the laboratory that will also be performing the PFAS analysis. Commercial laboratories that have demonstrated awareness and elimination of possible PFAS cross-contamination from sample containers and laboratory supplies should be used. Recommended sampling containers will be discussed for each environmental media. Any sampling containers provided by the laboratory should be verified as PFAS-free.

Before sampling, staff may come into contact with textiles and fabrics treated with PFAS, such as carpets and car interiors. Staff should be aware that these materials, and any other surfaces that repel water and are stain resistant, have the potential of being treated with PFAS. However, these are considered **Category 2** materials and the field personnel should be aware of the possible PFAS use. Sample containers and equipment that will be used for sampling should not be stored on or come into contact with materials suspected to contain PFAS.

For all environmental media, hands should be well washed before sampling. Clean powderless nitrile gloves must be put on before sample collection, handling of sample containers, and handling sampling equipment. The sample container must be kept sealed at all times and only open during the sample collection. The sampling container cap or lid should never be placed on any surface unless it is PFAS-free. The sampling container cap or lid must never be placed directly on the ground. A list of various materials used in sampling and handling can be found in the **MDEQ Quick Reference Field Guide** located at the end of this document.

In the absence of formal USEPA guidance for PFAS sample storage, the documentation in EPA Method 537 Rev. 1.1 should be used as a guide for thermal preservation (holding temperature), and holding times for other environmental media samples (with the exception of biota – in order to limit microbial growth, biota samples such as fish and vegetation are recommended to be kept frozen until the sample is prepared).

If published analytical reference methods, other than EPA Method 537 Rev. 1.1 are used, follow the guidelines or requirements in those methods for sample storage, preservation, and hold times. Otherwise EPA Method 537 Rev. 1.1 requries that samples must be chilled during storage and shipment, and must not exceed 50°F (10°C) during the first 48 hours after collection.

4.3.2 Sample Shipment

In general, for all environmental media sampled for PFAS, samples must be kept on ice from the time of sample collection to the arrival at the laboratory. The following procedures should be used for sample shipment:

●- Prohibited ■- Allowable ▲- Needs Screening

- Regular ice should be used to cool and maintain the sample at or below the proper temperature.
  - ▲ Chemical or blue ice may be used if it is known to be PFAS-free and it is absolutely certain that the sample is cooled and maintained at or below the proper temperature during collection and through transit to the laboratory.
- Refresh with regular ice, if needed, double bagged in LDPE resealable storage bags if needed.
- Fish and other wildlife samples should be placed on dry ice and frozen before the shipment to the lab. If fish is frozen, shipping the samples overnight on ice should be acceptable.
- The samples, ice, and chain of custody (COC) should always be bagged in polyethylene (i.e., Ziploc®) bags.
- Chain of Custody and other forms should be single bagged in LDPE resealable storage bags and taped to the inside of the cooler lid.
- The cooler should be taped closed with a custody seal and shipped by overnight courier.
- Samples should be shipped as soon as possible (e.g. overnight) to ensure the samples arrive within the analytical holding time specified by the lab.

4.3.3 Preferential Sampling Sequence

A preferred sampling sequence should be established before any sampling event to reduce the risk of cross-contamination. In general, the sampling sequence should be such that sampling starts in areas where it is expected or known to be least contaminated, to areas anticipated or identified to be most contaminated. If analytical results from past sampling events are available, the sampling sequence can be readily determined.

For many PFAS investigation sites, no PFAS sampling has been conducted. In these cases, all site information on possible PFAS uses and potential PFAS migration patterns (e.g., upgradient, downgradient) from PFAS sources at the site should be reviewed before the sampling event to help establish the sampling sequence.

If multiple samples (i.e., monitoring wells) will be collected for an area where a particular or potential PFAS release in the environment might have been documented, samples that are known to be upgradient from the impacted area should be sampled first, followed by those that are furthest downgradient from the suspected source. The remaining wells should be progressively sampled from the most distant downgradient to those closer to the known PFAS source.

If no information is available about the site, samples are to be collected in the following order:

1) drinking water (e.g., residential wells).
2) surface water.
3) groundwater.

4.4 Decontamination Procedures

It is customary with sampling that equipment is decontaminated at the conclusion of the sampling event. If the previous user of the equipment is not known, and it is unclear how the equipment was handled, especially rental equipment, the equipment should be decontaminated.

Disposable **Category 1** sampling equipment should be used, especially for sample bottles and other materials that are used where the sample may be in contact with the sampling equipment for an extended time period.

●- Prohibited ■- Allowable ▲- Needs Screening

Non-disposable sampling equipment used at multiple sites or sampling locations can become highly contaminated with PFAS. Decontamination procedures must be implemented to prevent cross-contamination, especially between individual sample locations. It is customary to decontaminate sampling equipment at the end of the sampling event, whether the event is a single sampling location or several sites that conclude at the end of the workday.

Throughout the sampling guidance documents, information will be provided about any media-specific decontamination procedures. For non-dedicated **Category 1** sampling equipment, there are many decontamination methods, two of which are listed below.

Decontamination Method 1:

- ● Do not use Decon 90®.
- ● Do not put equipment away without decontaminating it.
- ■ Laboratory supplied PFAS-free deionized water is preferred for decontamination.
- ■ Alconox®, Liquinox®, and Citranox® can be used for equipment decontamination.
- ■ Sampling equipment can be scrubbed using polyethylene or polyvinylchloride (PVC) brush to remove particulates.
- ■ Decontamination procedures should include triple rinsing with PFAS-free water.
- ■ Do decontaminate sampling equipment after sampling at each location, or at the end of the workday.
- ■ Commercially available deionized water in an HDPE container may be used for decontamination if the water is verified to be PFAS-free as defined in **Section 4.2.1** of this document.
- ▲ Municipal drinking water may be used for decontamination purposes if it is known to be PFAS-free.

Decontamination Method 2:

1. In a PFAS-free bucket, wash the equipment with a mixture of PFAS-free water and PFAS-free soap (bucket #1)
2. In a second PFAS-free bucket (bucket #2), rinse the equipment with PFAS-free water
3. A second rinse should be done with PFAS-free water using either a third bucket (bucket #3) or, if washed and rinsed, the second bucket (bucket #2).
4. For decontamination of additional equipment, change the decontamination water between cleanings.

4.5 Laboratory Considerations

The PFAS analytical list is available on the MPART website (www.michigan.gov/PFASresponse) under Testing and Treatment. This list includes the 14 analytes required to be analyzed for drinking water samples when using USEPA Method 537 Rev. 1.1, and the 24 analytes the MDEQ recommends be analyzed for all other environmental media. The MPART website should be visited to download the most recent document. Laboratories should be able to analyze and report PFAS results that will meet the project-specific data quality objectives identified in the QAPP.

Drinking Water Samples

USEPA Method 537 Revision 1.1 must be used for testing finished drinking water samples. Other methods are available for non-drinking water samples. Many laboratories refer to the isotope dilution method as 'modified Method 537,' however, the USEPA does not recognize isotope dilution as an acceptable modification of USEPA Method 537 Rev. 1.1 for drinking water analysis. USEPA drinking water methods are generally prescriptive, and only limited modifications are allowed because the finished treated drinking water is assumed to be free of significant interferences.

NOTE: USEPA Method 537 Rev. 1.1 was developed to be used only for finished drinking water samples, and contains specific requirements for sample preservation, shipping storage, and holding times.

USEPA Method 537 Rev. 1.1 was designed for finished drinking water and chemical preservation using Trizma® to buffer the sample and remove free chlorine. Non-chlorinated finished drinking water may also be analyzed using USEPA Method 537 Rev. 1.1.

Other Environmental Media Samples

There are currently no published USEPA methods using isotope dilution for determining PFAS in non-drinking water matrices or other sample media. There are USEPA methods for analyzing PFAS in additional matrices going through the development and validation process and may be available as early as fall of 2018. Some commercial laboratories have developed isotope dilution methods based on existing published methods, however, there may be significant differences between SOPs from different commercial laboratories regarding the details of the preparation and analysis of PFAS samples. A review of the laboratory's procedure and certifications should be done to ensure that the laboratory is capable of providing data that meet the data quality objectives of the project. MDEQ is implementing a laboratory SOP review process. Staff should refer to the MDEQ internal shared drive to see whether SOPs have been reviewed for the lab they are considering.

The following non-USEPA analytical methods have been published for use in determining PFAS in various media:

- ISO (International Organization for Standardization) Method 25101 (ISO, 2009) - Water quality Determination of PFOA and PFOS - Method for unfiltered samples of drinking water, groundwater, and surface water, using solid phase extraction and liquid chromatography/mass spectrometry (HPLC/MS/MS.)

- ASTM D7979 (ASTM, 2017) - Standard Test Method for Determination of Per- and Polyfluoroalkyl Substances in Water, Sludge, Influent, Effluent and Wastewater by Liquid Chromatography-Tandem Mass Spectrometry (LC/MS/MS). This method has been investigated for use with surface water, sludge, and wastewater for selected PFAS. This method has not been evaluated on drinking water matrices. Some commercial laboratories have modified this method and are using isotope dilution.

- ASTM D7968 (ASTM, 2017) - Standard Test Method for Determination of Polyfluorinated Compounds in Soil by Liquid Chromatography-Tandem Mass Spectrometry (LC/MS/MS). This procedure utilizes a quick extraction and is not intended to generate an exhaustive accounting of the content of PFAS in difficult soil matrices.

4.6 Quality Control Samples

4.6.1 Laboratory Quality Control Samples

The QAPP should describe what batch quality control (QC) samples – such as method blank (MB), laboratory control sample (LCS), laboratory control sample duplicate (LCSD), field duplicate (FD), matrix spike (MS), and matrix spike duplicate (MSD) – are prepared for each media type. In some cases, depending on the project, additional QC samples may be required. For samples with high concentrations of PFAS, an FD may be warranted. The QAPP should also reference the laboratory SOP.

4.6.2 Field Quality Control Samples

Field QC samples can be used to evaluate the field equipment and supplies as well as assess the possibility of cross-contamination during sampling, transport, and storage of samples. For samples such as equipment rinse blanks (EB), field blanks (FB), and trip blanks (TB) the following is required:

- EB should be collected by passing laboratory verified PFAS-free water over or through decontaminated field sampling equipment before the collection of samples to assess the adequacy of the decontamination process and/or to evaluate potential contamination from the equipment used during sampling. The recommended frequency should be in the QAPP.

- FB are prepared in the laboratory by placing an aliquot of PFAS-free water reagent water in a sample container and treating it as a sample in all respects, including shipment to the sampling site, exposure to sampling site conditions, storage, preservation, and all analytical procedures. The purpose of the FB is to determine if method analytes or other interferences are present in the field environment. The recommended frequency should be in the QAPP.

- TB are a bottle of PFAS-free water that should be prepared in the laboratory, should then travel from the laboratory to the site, and then get transported back to the laboratory without having been exposed to any sampling procedures. Typically, a TB is used for volatile compounds, but it may be recommended for PFAS sampling to assess cross-contamination introduced from the laboratory and during shipping procedures. The recommended frequency should be in the QAPP

5. References

Agency for Toxic Substances and Disease Registry (ATSDR). "Draft Toxicological Profile for Perfluoroalkyls." *United States Department of Health and Human Services. (*2015). *ATSDR.* Web. 19 June 2018. https://www.atsdr.cdc.gov/toxprofiles/tp200.pdf

ASTM International. "ASTM D7979 - Standard Test Method for Determination of Per- and Polyfluoroalkyl Substances in Water, Sludge, Influent, Effluent and Wastewater by Liquid Chromatography Tandem Mass Spectrometry (LC/MS/MS)." ASTM International. Web. 19 June 2018. https://www.astm.org/Standards/D7979.htm

ASTM International. "ASTM D7968 - Standard Test Method for Determination of Polyfluorinated Compounds in Soil by Liquid Chromatography Tandem Mass Spectrometry (LC/MS/MS)." ASTM International. Web. 19 June 2018. https://www.astm.org/Standards/D7968.htm

Borg, Daniel and Ivarsson, Jenny. "Analysis of PFASs and TOF in Products." *Nordic Co-Operation* 543 (2017): 1-47. *Nordic Council of Ministers*. Web. 19 June 2018. https://norden.diva-portal.org/smash/get/diva2:1118439/FULLTEXT01.pdf

Buck, Robert C et al. "Perfluoroalkyl and Polyfluoroalkyl Substances in the Environment: Terminology, Classification, and Origins." *Integrated Environmental Assessment and Management* 7(4) (2011): 513–541. *PMC*. Web. 11 June 2018. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3214619/

Danish Environmental Protection Agency (DEPA). "Polyfluoroalkyl substances (PFASs) in textiles for children." DEPA 137 (2015). *ResearchGate*. Web. 19 June 2018. https://www.researchgate.net/publication/299228813_Alternatives_to_perfluoroalkyl_and_polyfluoroalkyl_substances_PFAS_in_textiles_LOUS_Survey_of_chemical_substances_in_consumer_products

Fujii, Y. et al. "Occurrence of perfluorinated carboxylic acids (PFCAs) in personal care products and compounding agents." *Chemosphere* 93(3) (2013):538-544. *NCBI.* Web. 19 June 2018. https://www.ncbi.nlm.nih.gov/pubmed/23932147

Interstate Regulatory Technology Council (ITRC). "Regulations, Guidance, and Advisories for Per- and Polyfluoroalkyl Substances (PFAS)." (2017). *ITRC Web.* Web. 19 June 2018. https://pfas-1.itrcweb.org/wp-content/uploads/2018/01/pfas_fact_sheet_regulations__1_4_18.pdf

International Organization of Standardization (ISO). "ISO 25101:2009 Water quality -- Determination of perfluorooctanesulfonate (PFOS) and perfluorooctanoate (PFOA) -- Method for unfiltered samples using solid phase extraction and liquid chromatography/mass spectrometry." (2009). *Iso*. Web. 19 June 2018. https://www.iso.org/standard/42742.html

KEMI. "Occurrence and use of highly fluorinated substances and alternatives" *Swedish Chemicals Agency.* (2015). *KEMI*. Web. 19 June 2018. https://www.kemi.se/en/global/rapporter/2015/report-7-15-occurrence-and-use-of-highly-fluorinated-substances-and-alternatives.pdf

Organization for Economic Cooperation and Development (OECD)/UNEP Global PFC Group, "Technical Guidance Document on the Use of Socio-Economic Analysis in Chemical Risk Management Decision Making." *Risk Management Series* (14) (2002). OECD. Web. 19 June 2018. http://www.oecd.org/officialdocuments/publicdisplaydocumentpdf/?cote=ENV/JM/MONO(2002)10&docLanguage=En

Organization for Economic Cooperation and Development (OECD) (2013), OECD/UNEP Global PFC Group, Synthesis paper on per- and polyfluorinated chemicals (PFCs), Environment, Health and Safety, Environment Directorate, OECD. Web. 19 June 2018. https://www.oecd.org/env/ehs/risk-management/PFC_FINAL-Web.pdf

Rosenmai, A.K. et al. "Fluorochemicals used in food packaging inhibit male sex hormone synthesis." *Toxicology and Applied Pharmacology* 266(1) (2013): 132-142. *Elsevier*. Web. 19 June 2018. https://www.sciencedirect.com/science/article/pii/S0041008X12004644

Schaider, Laurel A. et al. "Fluorinated Compounds in U.S. Fast Food Packaging." *Environmental Science and Technology Letters* 4(3) (2017): 105-111. *ACS*. Web. 19 June 2018. https://pubs.acs.org/doi/abs/10.1021/acs.estlett.6b00435

Trier, Xenia et al. "Polyfluorinated surfactants (PFS) in paper and board coatings for food packaging." *Environmental Science and Pollution Research*. 18(7) (2011): 1108-1120. *SpringerLink*. Web. 19 June 2018. https://link.springer.com/article/10.1007/s11356-010-0439-3

United States Environmental Protection Agency (USEPA). SHOEMAKER, J. A., P. GRIMMETT, AND B. BOUTIN. Determination of Selected Perfluorinated Alkyl Acids in Drinking Water by Solid Phase Extraction and Liquid Chromatography/Tandem Mass Spectrometry (LC/MS/MS). (USEPA Method 537 Revision 1.1) USEPA, Washington, DC, 2008. https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=525468

Wang, Zhanyun et al. "A Never-Ending Story of Per- and Polyfluoroalkyl Substances (PFASs)?" *Environmental Science & Technology* 51(5) (2017): 2508-2518. *ACES Publications*. Web. 11 June 2018. https://pubs.acs.org/doi/pdf/10.1021/acs.est.6b04806

6. Trademarks

Trademarks used in this document are as follows, and do not constitute an endorsement by the MDEQ:
Alconox® is a registered trademark of Alconox, Inc.
Bionic Finish® is a registered trademark of the Rudolf Group.
Citronex® is a registered trademark of Citronex.
Decon 90® is a trademark of Decon Laboratories Limited.
Gatorade® is a registered trademark of Stokely-Van Camp, Inc.
Gore-Tex® is a registered trademark of W. L. Gore & Associates, Inc.
GreenShield® is a registered trademark of BigSky Technologies LLC.
Hostaflon® FEP is a registered trademark of Hoechst AG.
Hostaflon® is a registered trademark of the Chemours Company (formerly E. I. DuPont de Nemours and Company).
Kynar® is a registered trademark of Arkema, Inc.
Liquinox® is a registered trademark of Alconox, Inc.
Lurotex Protector RL ECO® is a registered trademark of BASF Group.
Neoflon® FEP is a registered trademark of Daikin Industries, Ltd.
Neoflon® is a registered trademark of Daikin Industries, Ltd.
NK Guard S series™ is a registered trademark of Nicca.
Post-It® notes are a registered trademark of 3M.
Powerade® is a registered trademark of The Coca-Cola Company.
Repellan KFC® is a registered trademark of Pulcra Chemicals.
Resist Spills and Releases Stains™ is a registered trademark of Nano-Tex.
Resist Spills™ is a registered trademark of Nano-Tex.
Rite in the Rain® is a registered trademark of JL Darling LLC.
RUCO® is a registered trademark of the Rudolf Group.
RUCO-COAT® is a registered trademark of the Rudolf Group.
RUCO-GUARD® is a registered trademark of the Rudolf Group.
RUCO-PROTECT® is a registered trademark of the Rudolf Group.
Rucostar® EEE6 is a registered trademark of the Rudolf Group.
RUCOSTAR® is a registered trademark of the Rudolf Group.
RUCOTEC® is a registered trademark of the Rudolf Group.
Scotchgard™ Fabric Protector is a registered trademark of 3M.
Sharpie® is registered trademark of Newell Brands.
Teflon® is a trademark of the Chemours Company (formerly E.I. DuPont de Nemours and Company).
Tefzel® is a registered trademark of the Chemours Company (formerly E. I. DuPont de Nemours and Company).
Trizma® is a registered trademark of the Sigma-Aldrich Company.
Tyvek® is a registered trademark of the Chemours Company (formerly E. I. DuPont de Nemours and Company).
Unidyne™ is a registered trademark of Daikin Industries, Ltd.
Ziploc® is a registered trademark of S. C. Johnson & Son.

[THIS PAGE IS INTENTIONALLY LEFT BLANK]

Michigan Department of Environmental Quality

MDEQ PFAS Sampling Quick Reference Field Guide[1]

All Items Used During Sampling Event

Prohibited

• Items or materials that contain fluoropolymers such as
  ○ Polytetrafluoroethylene (PTFE), that includes the trademarks Teflon® and Hostaflon®
  ○ Polyvinylidene fluoride (PVDF), that includes the trademark Kynar®
  ○ Polycholotrifluoroethylene (PCTFE), that includes the trademark Neoflon ®
  ○ Ethylene-tetrafluoro-ethylene (ETFE), that includes the trademark Tefzel®
  ○ Fluorinated ethylene propylene (FEP), that includes the trademarks Teflon® FEP and Hostaflon® FEP
• Items or materials that contain any other fluoropolymer

Pumps, Tubing, and Sampling Equipment

Prohibited	Allowable	Needs Screening[2]

• Items or materials containing any fluoropolymer (potential items include tubing, valves, or pipe thread seal tape)	• High-density polyethylene (HDPE)
	• Low-density polyethylene (LDPE) tubing
	• Polypropylene
	• Silicone
	• Stainless-steel
	• Any items used to secure sampling bottles made from:
	  ○ Natural rubber
	  ○ Nylon (cable ties)
	  ○ Uncoated metal springs
	  ○ Polyethylene
		• Any items or materials that will come into direct contact with the sample that have **not** been verified to be PFAS-free
		  ○ Do not assume that any sampling items or materials are PFAS-free based on composition alone

Sample Storage and Preservation

Prohibited	Allowable	Needs Screening[2]
• Polytetrafluoroethylene (PTFE): Teflon® lined bottles or caps	• Glass jars[4] • Laboratory-provided PFAS-Free bottles: ○ HDPE or polypropylene • Regular wet ice • Thin HDPE sheeting • LDPE resealable storage bags (i.e. Ziploc®) that will not contact the sample media[6]	• Aluminium foil[4] • Chemical or blue ice[5] • Plastic storage bags other than those listed as ■ Allowable • Low-density polyethylene (LDPE) bottles

Field Documentation

Prohibited	Allowable	Needs Screening[2]
• Clipboards coated with PFAS • Notebooks made with PFAS treated paper • PFAS treated loose paper • PFAS treated adhesive paper products	• Loose paper (non-waterproof, non-recycled) • Rite in the Rain® notebooks • Aluminium, polypropylene, or Masonite field clipboards • Ballpoint pens, pencils, and Fine or Ultra-Fine Point Sharpie® markers	• Plastic clipboards, binders, or spiral hard cover notebooks • All markers not listed as ■ Allowable • Post-It® Notes or other adhesive paper products • Waterproof field books

Decontamination

Prohibited	Allowable	Needs Screening[2]
• Decon 90® • PFAS treated paper towel	• Alconox®, Liquinox®, or Citranox® • Triple rinse with PFAS-free deionized water • Cotton cloth or untreated paper towel	• Municipal water • Recycled paper towels or chemically treated paper towels

Clothing, Boots, Rain Gear, and PPE

● Prohibited	■ Allowable	▲Needs Screening[2]
• New or unwashed clothing • Anything made of or with: o Gore-Tex™ or other water-resistant synthetics • Anything applied with or recently washed with: o Fabric softeners o Fabric protectors, including UV protection o Insect resistant chemicals o Water, dirt, and/or stain resistant chemicals	• Powderless nitrile gloves • Well-laundered synthetic or 100% cotton clothing, with most recent launderings not using fabric softeners • Made of or with: o Polyurethane o Polyvinyl chloride (PVC) o Wax coated fabrics o Rubber / Neoprene o Uncoated Tyvek®	• Latex gloves • Water and/or dirt resistant leather gloves • Any special gloves required by a HASP • Tyvek® suits, clothing that contains Tyvek®, or coated Tyvek®

Food and Beverages

● Prohibited	■ Allowable
• No food should be consumed in the staging or sampling areas, including pre-packaged food or snacks. ■ If consuming food on-site becomes necessary, move to the staging area and remove PPE. After eating, wash hands thoroughly and put on new PPE.	• Brought and consumed only outside the vicinity of the sampling area: o Bottled water o Hydration drinks (i.e. Gatorade®, Powerade®)

Personal Care Products (PCPs) - for day of sample collection[6]

● Prohibited	■ Allowable	▲Needs Screening[2]
• Any PCPs[6], sunscreen, and insect repellent applied in the sampling area.	PCPs[6], sunscreens, and insect repellents applied in the staging area, away from sampling bottles and equipment followed by thoroughly washing hands: **PCPs[6]:** • Cosmetics, deodorants/antiperspirants, moisturizers, hand creams, and other PCPs[6] **Sunscreens:** • Banana Boat® for Men Triple Defense Continuous Spray Sunscreen SPF 30 • Banana Boat® Sport Performance Coolzone Broad Spectrum SPF 30 • Banana Boat® Sport Performance Sunscreen Lotion Broad Spectrum SPF 30 • Banana Boat® Sport Performance Sunscreen Stick SPF 50 • Coppertone® Sunscreen Lotion Ultra Guard Broad Spectrum SPF 50 • Coppertone® Sport High Performance AccuSpray Sunscreen SPF 30 • Coppertone® Sunscreen Stick Kids SPF 55 • L'Oréal® Silky Sheer Face Lotion 50 • Meijer® Clear Zinc Sunscreen Lotion Broad Spectrum SPF 50 • Meijer® Sunscreen Continuous Spray Broad Spectrum SPF 30 • Meijer® Clear Zinc Sunscreen Lotion Broad Spectrum SPF 15, 30 and 50 • Meijer® Wet Skin Kids Sunscreen Continuous Spray Broad Spectrum SPF 70 • Neutrogena® Beach Defense Water+Sun Barrier Lotion SPF 70 • Neutrogena® Beach Defense Water+Sun Barrier Spray Broad Spectrum SPF 30 • Neutrogena® Pure & Free Baby Sunscreen Broad Spectrum SPF 60+ • Neutrogena® UltraSheer Dry-Touch Sunscreen Broad Spectrum SPF 30 **Insect Repellents:** • OFF® Deep Woods • Sawyer® Permethrin	• Products other than those listed as ■Allowable

[1] This table is not considered to be a complete listing of prohibited or allowable materials. All materials should be evaluated prior to use during sampling. The manufacturers of various products should be contacted in order to determine if PFAS was used in the production of any particular product.

[2] Equipment blank samples should be taken to verify these products are PFAS-free prior to use during sampling.

[3] **For surface water foam samples:** LDPE storage bags may be used in the sampling of foam on surface waters. In this instance, it is allowable for the LDPE bag to come into direct contact with the sample media.

[4] **For fish and other wildlife samples:** Depending on the project objectives, glass jars and aluminum foil might be used for PFAS sampling. PFAS has been found to bind to glass and if the sample is stored in a glass jar, a rinse of the jar is required during the sample analysis. PFAS are sometimes used as a protective layer for some aluminum foils. An equipment blank sample should be collected prior to any aluminum foil use.

[5] Regular ice is recommended as there are concerns that chemical and blue ice may not cool and maintain the sample at or below 42.8°F (6°C) (as determined by EPA 40 CFR 136 – NPDES) during collection and through transit to the laboratory.

[6] Based on evidence, avoidance of PCPs is considered to be precautionary because none have been documented as having cross-contaminated samples due to their use. However, if used, application of PCPs must be done at the staging area and away from sampling bottles and equipment, and hands must be thoroughly washed after the use of any PCPs prior to sampling.

●- Prohibited ■- Allowable ▲- Needs Screening

Attachment B

Michigan Department of Environmental Quality
Groundwater PFAS Sampling Guidance

Michigan Department of Environmental Quality

GROUNDWATER PFAS SAMPLING

Guidance

Introduction

This sampling guidance discusses the processes and acceptable items and materials that should be used when sampling groundwater monitoring wells for per- and polyfluoroalkyl substances (PFAS). The guidance primarily addresses the collection of representative water samples from the subsurface saturated zone. In addition, this guidance will be used to support the sampling objectives and procedures based on the Quality Assurance Project Plan (QAPP) developed prior to sampling activities. This guidance assumes staff has basic familiarity with and/or understanding of basic groundwater sampling procedures.

NOTE: Review the **General PFAS Sampling Guidance** document prior to reviewing this guidance document.

This sampling guidance may be varied or changed as required, depending on site conditions, equipment limitations, or limitations imposed by the procedure. The ultimate procedures used should be documented in the final report.

The MDEQ intends to update the information contained within this Groundwater PFAS Sampling Guidance document as new information becomes available. The user of this Groundwater PFAS Sampling Guidance is encouraged to visit the Michigan PFAS Action Response Team (MPART) webpage (www.michigan.gov/PFASresponse) to access the most current version of this document.

PFAS has been detected in groundwater in Michigan at concentrations over 810,000 parts per trillion (ppt). Many commercial laboratories have extremely low PFAS detection limits of about 1 ppt. Therefore, there is a high potential of false positives if proper procedures are not followed during sample collection.

This Groundwater PFAS Sampling Guidance discusses the collection of groundwater samples and methods to prevent cross-contamination that can occur from:

- Field clothing and personal protective equipment (PPE)
- Personal care products (PCPs)
- Food Ppckaging
- Sampling equipment
- Equipment decontamination
- Filtering of surface water
- Sample collection and handling
- Sample shipment

Contents

●- Prohibited ■- Allowable ▲- Needs Screening

1. Potential Sources for PFAS Cross-Contamination

Potential sources for PFAS cross-contamination include items and materials used within the sampling environment, such as sampling equipment, field clothing, personal protective equipment (PPE), sun and biological protection products, personal hygiene, personal care products (PCPs), and food packaging. A detailed discussion about potential sources for PFAS cross-contamination is included in the **General PFAS Sampling Guidance**, which should be reviewed before reading this document. However, a high-level summary is presented in this guidance.

All of the items and materials discussed in each of the MDEQ's PFAS Sampling Guidance Documents are divided into three major groups:

- Prohibited (●) identifies items and materials that should not be used when sampling. It is well documented that they contain PFAS or that PFAS are used in their manufacture.

- Allowable (■) identifies items and materials that have been proven not to be sources of PFAS cross contamination and are considered acceptable for sampling.

- Needs Screening (▲) identifies items and materials that have the potential for PFAS cross-contamination due to a lack of scientific data or statements from manufacturers to prove otherwise. These items and materials are further sub-divided into two categories:

    - **Category 1:** Items and materials that <u>will come in direct contact</u> with the sample. These should not be used when sampling unless they are known to be PFAS-free, by collecting an equipment blank sample prior to use.

    - **Category 2:** Items and materials that <u>will not come in direct contact</u> with the sample. These should be avoided, if possible, unless they are known to be PFAS-free by collecting an equipment blank sample prior to use.

Please note that at this time no published research is available that documents the use of various materials and effect on sample results. Therefore, a conservative approach is recommended, and the guidance is based on the collection of multiple environmental samples at various PFAS sites. Sampling staff should take practical and appropriate precautions to avoid items that are likely to contain PFAS at the sampling site as well as avoid specific items during the sampling event.

A general overview of PFAS contamination sources during sampling can be found in **Section 4.2** of the **General PFAS Sampling Guidance**. Any items or materials utilized that are not identified in this guidance or not discussed in **Section 4.2** should be evaluated as described in **Section 4.2.1 of the General PFAS Sampling Guidance**.

Sampling staff should take practical and appropriate precautions to avoid items that are likely to contain PFAS at the sampling site as well as avoid specific items during the sampling event (see below).

1.1 Field Clothing and PPE

Materials, field clothing, and equipment screening should be performed during the QAPP development or the planning phase of sampling programs. The screening should be performed on all items and materials that are expected to come into contact with the samples and are defined as **Category 1.** Due to the extensive use of PFAS in many industries and

products, PPE may contain PFAS. During a PFAS investigation, PPE containing PFAS should be avoided to prevent cross-contamination.

As with any field mobilization, it is the responsibility of all personnel to be aware of the physical, chemical, and biological hazards associated with a particular site. Personal safety is paramount. The safety of staff should not be compromised by fear of PFAS-containing items or materials without any scientific basis. Any deviation from this guidance, including those necessary to ensure the health and safety of sampling personnel, should be recorded in field notes and discussed in the final report.

Any additional field clothing and/or PPE items that might be required for groundwater sampling and not discussed in this sampling guidance should be evaluated as described in **Sections 4.2.1** and **4.2.2** of the **General PFAS Sampling Guidance**.

NOTE: Special attention should be given to clothing that has been advertised as having waterproof, water-repellant, or dirt and/or stain characteristics. They are likely to have PFAS in their manufacturing.

Field sampling during wet weather (e.g., rainfall and snow) should be conducted while wearing the proper field clothing.

- Dust and fibers must not be allowed to collect on field clothing or PPE.
- Do not use clothing that has been advertised as waterproof, dirt and/or stain repellant that has not been verified to be made of PFAS-free materials.
- Use powderless nitrile gloves
- Only use clothing/PPE that has been verified to be made of PFAS-free materials.
- Latex gloves should be screened before use.

Powderless nitrile gloves should be changed frequently any time there is an opportunity for cross-contamination. See **Section 5** of this guidance for additional glove instructions.

1.2 Personal Care Products (PCPs)

A number of sampling guidance documents recommend that personal hygiene and PCPs (e.g., cosmetics, shampoo, sunscreens, dental floss, etc.) not be used prior to and on the day(s) of sampling because the presence of PFAS in these products has been documented (OECD, 2002, Fujii, 2013, Borg and Ivarsson, 2017). However, if the MDEQ's sampling SOPs are followed, these items should not come into contact with the sampling equipment or the sample being collected. As of the date of this sampling guidance, cross-contamination of samples due to the use of PCPs has not been documented during the collection of thousands of samples. However, field personnel should be aware of the potential of cross-contamination of the sampling equipment or actual samples would come into contact with these products. The following precautions should be taken when dealing with personal hygiene or PCPs before sampling:

- Do not handle or apply PCPs in the sampling area.
- Do not handle or apply PCPs while wearing PPE that will be present during sampling.
- Move to the staging area and remove PPE if applying personal care products becomes necessary.
- Wash hands thoroughly after the handling or application of PCPs and, when finished, put on a fresh pair of powderless nitrile gloves.

1.3 Food Packaging

PFAS has been used by the paper industry as a special protective coating against grease, oil, and water for paper and paperboards, including food packaging since the late 1950s (Trier et al., 2018). PFAS application for food packaging includes paper products that come into contact with food such as paper plates, food containers, bags, and wraps (OECD, 2002). Pre-wrapped food or snacks (such as candy bars, microwave popcorn, etc.) must not be in the sampling and staging areas during sampling due to PFAS contamination of the packaging. When staff requires a break to eat or drink, they should remove their gloves, coveralls, and any other PPE, if worn, in the staging area and move to the designated area for food and beverage consumption. When finished, staff should wash their hands and put on a fresh pair of powderless nitrile gloves at the staging area, before returning to the sampling area.

- ● Do not handle, consume, or otherwise interact with pre-wrapped food or snacks, carry-out food, fast food, or other food items while on-site during sampling.
- ■ Move to the staging area and remove PPE prior to leaving the sampling and staging areas if consuming food on site becomes necessary.

2. Groundwater Sampling Equipment

Do not use any equipment that contains any known fluoropolymers including, but not limited to:

- ● Do not use polytetrafluoroethylene (PTFE), that includes the trademark Teflon® and Hostaflon®, which can be found in many items, including but not limited to ball check-valves on certain bailers, the lining of some hoses and tubing, some wiring, certain kinds of gears, lubricant, and some objects that require the sliding action of parts.
- ● Do not use Polyvinylidene fluoride (PVDF), that includes the trademark Kynar®, which can be found in many items, including but not limited to tubing, films/coatings on aluminum, galvanized or aluminized steel, wire insulators, and lithium-ion batteries.
- ● Do not use Polychlorotrifluoroethylene (PCTFE), that includes the trademark Neoflon®, which can be found in many items, including but not limited to valves, seals, gaskets, and food packaging.
- ● Do not use Ethylene-tetrafluoro-ethylene (ETFE), that includes the trademark Tefzel®, which can be found in many items, including but not limited to wire and cable insulation and covers, films for roofing and siding, liners in pipes, and some cable tie wraps.
- ● Do not use Fluorinated ethylene propylene (FEP), that includes the trademarks Teflon® FEP and Hostaflon® FEP, and may also include Neoflon®, which can be found in many items, including but not limited to wire and cable insulation and covers, pipe linings, and some labware.
- ● Do not use low density polyethylene (LDPE) for any items that will come into **direct contact** with the sample media. LDPE can be found in many items, including but not limited to containers and bottles, plastic bags, and tubing.
  - ▲ **However**, LDPE may be used if an equipment blank has confirmed it to be PFAS-free. LDPE does not contain PFAS in the raw material but may contain PFAS cross-contamination from the manufacturing process.
- ■ LDPE bags (e.g., Ziploc®) that **do not** come into direct contact with the sample media and do not introduce cross-contamination with samples may be used.

> **NOTE:** Manufacturers can change the chemical composition of any product. As a result, all materials that will come into direct contact with the sample media (defined as Category 1) should be tested to confirm they are "PFAS-free," i.e. will not contaminate samples at detectable levels. **There is no guarantee that materials in the "Allowable" category will always be PFAS- free.**

● - Prohibited ■ - Allowable ▲ - Needs Screening

- Use items and materials that are either made of high-density polyethylene (HDPE), polypropylene, silicone, polyvinyl chloride(PVC), or acetate.
- Keep tubing in the original cardboard or bag in which it was shipped.
- Store tubing in a clean location free of dust and fibers.
- Use nylon line, cotton string, or other PFAS-free material when raising and lowering bailers.
- When using bladder pumps, use pumps made of stainless steel with polyethylene bladders.
- Glass bottles or containers may be used if they are known to be PFAS-free, however, PFAS have been found to adsorb to glass, especially when the sample is in contact with the glass for a long period of time (e.g. being stored in a glass container). If the sample comes into direct contact with the glass for a short period of time (e.g. using a glass container to collect the sample, then transferring the sample to a non-glass sample bottle), the adsorption is minimal.
- In many submersible pumps, the O-Rings do not come into contact with the groundwater sample, and in this case, the O-Rings should be treated as internal pump components. The O-Rings present a low possibility of cross-contamination. Equipment blanks should be collected simulating actual field sampling procedures and not for individual pump components.

Field rental equipment companies offer "PFAS-free" bladder pumps; however, caution is advised, and an equipment rinsate blank is required. Rental equipment should be treated as being contaminated and only used after proper decontamination has been done.

Staff should follow the **MDEQ PFAS Sampling Quick Reference Field Guide** at the end of this document for approved and prohibited items for documenting and sampling groundwater for PFAS.

3. Equipment Decontamination

It is customary with groundwater sampling that the equipment is decontaminated before the sampling event. If the previous user of the equipment is not known, and it is unclear how the equipment was handled—especially rental equipment—decontaminate the equipment before sampling. Any **Category 1** non-dedicated sampling equipment (equipment used for more than one location) must be verified as PFAS free before use.

For non-dedicated **Category 1** sampling equipment, the following materials and procedures must be used for decontamination:

- Do not use Decon 90®.
- Laboratory supplied PFAS-free deionized water is preferred for decontamination.
- Alconox®, Liquinox®, and Citranox® can be used for equipment decontamination.
- Sampling equipment can be scrubbed using a polyethylene or Polyvinyl chloride (PVC) brush to remove particulates.
- Decontamination procedures should include triple rinsing with PFAS-free water.
- Commercially available deionized water in an HDPE container may be used for decontamination if the water is verified to be PFAS-free.
- Municipal drinking water may be used for decontamination purposes if it is known to be PFAS-free.

NOTE: All samples must be collected using PFAS-free High-Density Polyethylene (HDPE), glass, or polypropylene bottles provided by the laboratory, with Teflon®-free caps.

4. Groundwater Sample Collection Methods

4.1 Method summary

Before a well is sampled, stagnant water in the well casing must be removed or purged in order to obtain a representative groundwater sample. The instruments most commonly used for purging by the MDEQ are bailers, submersible pumps, and inertia pumps. MDEQ staff may oversee purging and sampling conducted by noncontact gas bladder pumps, suction-lift pumps, and other pumps, but the MDEQ does not typically use these pumps. The MDEQ typically samples groundwater using bailers, or by low-flow methods utilizing a peristaltic pump.

Prior to purging, the water level in the well and the total depth of the well should be measured, using the procedures described in the QAPP to determine the volume of water in the well. When using a bailer, a minimum of three well volumes should be purged, unless the well runs dry. When using low-flow methods, purging should continue until the selected indicator parameters have stabilized (see **Section 4.7 Low-Flow Methods**).

Once purging is completed or the groundwater in the well recovers, the groundwater pH, temperature, specific conductance, and turbidity should be measured using the procedures described in the QAPP. After the correct sample containers have been prepared, sampling may proceed. Care should be taken when choosing the sampling device, since some devices may affect the integrity of the sample.

NOTE: Purging is mandatory in all cases where there is the potential for the data to be used for enforcement purposes.

Purging and sampling should occur in a progression from the least contaminated well to the most contaminated well, if this information is known; disposable equipment should be used for each well or equipment must be decontaminated prior to use and between each well.

4.2 Calculations

If it is necessary to calculate the volume of water in the well, use the following equation:

Well volume (gallons) = $\pi r^2 h$ (cf)
where:

- r = radius of monitoring well (feet)
- h = height of the water column (feet) (This may be determined by subtracting the depth to the water from the total depth of the well as measured from the same reference point.)
- cf = conversion factor (gallons/linear foot) = 7.48 gal/ft^3

If the diameter of the monitoring well is known, standard conversion factors can be applied to simplify the equation above. Monitoring well diameters are typically two, three, four, or six inches.

Well volumes, in gallons per linear foot, for these common monitoring well diameters are as follows:

Well diameter	2-inches	3-inches	4-inches	6-inches
Volume (gal/ft.)	0.1632	0.3672	0.6528	1.4688

The volume of water in the well can then be calculated by multiplying the appropriate value of gallons per linear foot by the height of the water column in feet (h).

This well volume is typically tripled to determine the volume to be purged.

4.3 Preparation Procedures

The success of any sampling effort depends on thorough preparation. The following steps should be followed in preparing for groundwater well sampling:

1. Determine the extent of the sampling effort, the sampling methods to be used, and the types and quantities of equipment and supplies needed.
2. Develop and implement a site-specific sampling plan.
3. Prepare the schedule and coordinate with the laboratory, staff, contractors, and the regulated facility, as appropriate.
4. Obtain necessary sampling and monitoring equipment and supplies.
5. Decontaminate or preclean equipment, and ensure that it is in working order.
6. Perform a general site survey prior to site entry in accordance with the site-specific Health and Safety Plan (HASP), if appropriate.
7. Identify all monitoring wells to be sampled.
8. Start at the least contaminated well, if known.
9. Powderless nitrile gloves should be changed between each discrete task in the well purging and sampling process.
10. Remove the locking well cap; note the location, time of day, date and general weather conditions in the field logbook or Monitor Well and Groundwater Data Sheets.
11. Remove the well casing cap.
12. Lower the water level measuring device into the well until the water surface is encountered. Refer to the QAPP for specific water level measurement procedures.
13. Measure the distance from the water surface to a known reference measuring point on the well casing or protective barrier post and record the distance in the field logbook or Monitor Well and Groundwater Data Sheets. Alternatively, if no known reference point is available, note that the water level measurement is from the top of the steel casing, top of the riser pipe from ground surface, or some specific position on the well head.
14. Measure total depth of the well and record the depth in the field logbook or Monitor Well and Groundwater Data Sheets.
15. Calculate the volume of water in the well and the volume to be purged using the equations in **Section 4.2 Calculations**.

4.4 Purging Procedures

Wells should be purged to ensure that a representative sample is obtained. Generally, at a minimum, purging of three well volumes is effective. Bailers, submersible pumps, and inertia pumps are the purging devices most commonly used.

NOTE: Reference and utilize the *MDEQ Purge Water Disposal Policy* for detailed purge water disposal procedures.

- Purge water should be containerized, characterized, and properly disposed of. Sample results for the well can be used to assist in waste characterization.

  If no other option is available and only a small volume of purge water has been generated, purge water may be disposed of on the ground near the well.

- Do not dispose of purge water in a way that the disposal will exacerbate existing contamination.

4.4.1 Bailers

Bailers are the simplest purging device used and have many advantages. They generally consist of a rigid length of tube, with a ball check-valve at the bottom. A line is used to lower the bailer into the well and retrieve a volume of water.

Manual purging with bailers is best suited to shallow and/or narrow-diameter wells. For deep, larger-diameter wells that require purging large volumes of water, other devices may be more appropriate.

Procedures for purging with a bailer are as follows:

1. Determine the volume of water to be purged as described in **Section 4.2 Calculations.**
2. Attach the line to the bailer and slowly lower the bailer until it is completely submerged. Be careful not to drop the bailer to the water, as it causes turbulence and the possible loss of volatile organic contaminants. On the bailer's first trip down the well, it is good sampling practice to gently lower it to the bottom of the well casing so that the sampler has an adequate length of line in hand to bail the well dry, should it be needed.
3. Pull the bailer out in a manner that the line never touches the ground.
4. Empty the bailer into a graduated pail.
5. Collect and dispose of purge water in accordance with the *MDEQ Purge Water Disposal Policy* and any additional requirements in the site-specific sampling plan. If purge water is disposed of on the ground, this should be done away from the base of the well.

4.4.2 Submersible Pumps

The use of submersible pumps for purging is permissible, provided they are constructed of suitably noncontaminating materials. The chief drawback, however, is possible cross-contamination between wells. Although some units can be disassembled easily to allow surfaces contacted by contaminants to be cleaned, field decontamination may be difficult and require solvents that can affect sample analysis.

NOTE: Submersible pumps may be the only practical sampling device for extremely deep wells (greater than 300 feet of water). Under those conditions, it is recommended that dedicated pump systems be installed to eliminate the potential for cross-contamination of well samples.

The use of submersible pumps in multiple well-sampling programs should be carefully compared to other sampling mechanisms (e.g., bailers, peristaltic pumps). In many cases, a sample can be collected by a bailer after purging with a submersible pump.

Submersible pumps generally use one of two types of power supplies: electric or compressed gas. Electrically powered pumps can run off a 12-volt DC rechargeable

battery, or a 110 or 220-volt AC power supply. Pumps powered by compressed air normally use a small electric or gas-powered air compressor. They may also utilize compressed gas (i.e., nitrogen) from bottles. Differently sized pumps are available for different depth or diameter monitoring wells.

Procedures for purging with a submersible pump are as follows:

1. Determine the volume of water to be purged as described in **Section 4.2 Calculations**.
2. Assemble the pump, hoses, and safety cable, then lower the pump into the well. Make sure the pump is deep enough so that all the water is not evacuated (running the pump dry may cause damage).
3. Determine the volume of water purged by discharging purged water into a graduated pail or by attaching a flow meter to the outlet hose.
4. Use a ground fault circuit interrupter or ground the generator to avoid possible electric shock.
5. Connect the power supply and purge the well until the specified volume of water has been evacuated. If the pumping rate exceeds the well recharge rate, lower the pumping rate, lower the pump further into the well, and continue pumping.
6. Collect and dispose purge waters in accordance with the *MDEQ Purge Water Disposal Policy* and any additional requirements in the site-specific sampling plan. If purge water is disposed on the ground, this should be done away from the base of the well.

4.4.3 Inertia Pumps

Inertia pumps, such as the WaTerra® pump and piston pump, are manually operated. They are the most appropriate to use when wells are too deep to bail by hand, or too shallow, narrow, or inaccessible for a submersible pump. Inertia pumps are made of plastic or stainless steel and may be either decontaminated or discarded.

Procedures for purging with an inertia pump are as follows:

1. Determine the volume of water to be purged as described in **Section 4.2 Calculations.**
2. Assemble the pump and lower it to the appropriate depth in the well.
3. Begin pumping manually, discharging the water into a graduated pail. Purge until the specified volume of water has been evacuated.
4. Collect and dispose purge waters in accordance with the *MDEQ Purge Water Disposal Policy* and any additional requirements in the site-specific sampling plan. If purge water is disposed on the ground, this should be done away from the base of the well.

4.5 Representative Sample Collection

The primary goal in performing groundwater sampling is to obtain a representative sample of the aquifer or water-bearing zone. Groundwater sampling results can be compromised in two primary ways: collecting a non-representative sample or handling the sample incorrectly.

A monitoring well will have little or no vertical mixing of the water, and stratification will occur. The well water in the screened section will mix with the groundwater due to normal flow patterns, but the well water above the screened section will remain isolated, become stagnant, and may no longer be representative of the groundwater quality. Also, stagnant water may contain foreign material inadvertently or deliberately introduced from the surface, resulting in a non-representative sample. To safeguard against collecting non-representative stagnant water, the following guidelines and techniques should be adhered to during sampling:

1. As a general rule, all monitoring wells should be purged prior to sampling; see **Section 4.3 Purging Procedures.** To obtain a representative sample, a minimum of three volumes of water in the well casing should be purged. When using low-flow methods, purging should continue until the selected indicator parameters have stabilized. Indicator parameters typically used in low-flow purging include groundwater pH, specific conductivity, turbidity, temperature, dissolved oxygen and oxidation-reduction potential. The appropriate set of indicator parameters for the specific sampling event should be chosen by the project manager in advance of the sampling event. Alternatively, for low-yielding groundwater formations, the well can be pumped dry. For deeper wells, packers can be used to isolate a portion of the screened interval, minimizing the volume of groundwater that must be purged. In a high-yielding groundwater formation and where there is no stagnant water in the well above the screened section, purging is not as critical.
2. When purging with a pump, the pump should be set within the screened interval. When sampling a screened well, the sample should also be collected from the same depth within the screened interval at which the pump was set.
3. The well should be sampled as soon as possible after purging.
4. For wells that are pumped or bailed to dryness prior to the purging procedure being completed, the well should be allowed to recover (for up to, but no longer than, 24 hours) prior to collecting a sample.
5. A non-representative sample can also result from excessive pre-pumping of the monitoring well. Stratification of the constituent concentration in the groundwater formation may occur, or heavier-than-water compounds may sink to the lower portions of the aquifer. Excessive pumping can dilute or increase the constituent concentrations relative to those at the sampling point of interest.
6. A sampling methodology must be used that accounts for the effects of aquifer heterogeneities, while minimizing alterations in water chemistry that could result from sampling disturbances. The MDEQ will accept properly conducted purging methods designed to minimize drawdown, by controlling the flow from the well while monitoring stabilization indicator parameters, commonly referred to as low-flow methods. Available low-flow procedures include:

    - United States Environmental Protection Agency (USEPA), Office of Research and Development, Office of Solid Waste and Emergency Responses, EPA/540/S-95/504, April 1996, USEPA Ground Water Issue, *Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures*, Robert Puls and Michael Barcelona
    - USEPA, Region 1, July 30, 1996, Revision 3, *Low Stress (Low-Flow) Purging and Sampling Procedure for the Collection of Ground Water Samples from Monitoring Wells*

4.6 Low-Flow Methods

Low-flow sampling involves the slow removal of a minimal amount of water from a well to ensure that stagnant water is removed and that water in the well is representative of water in the formation. The advantage of low-flow sampling is that, when conducted properly, it avoids

disrupting the formation and minimizes turbidity that can be introduced by other purging and sampling devices, such as bailers. Instead of removing a set volume of water from the well, low-flow sampling uses a pump (typically a peristaltic pump), set at a low rate of flow, to continuously remove water until a set of indicator parameters are stabilized.

Flow rates are typically on the order of 100 to 200 milliliters per minute (ml/min) and should never exceed 500 ml/min. Indicator parameters are measured using probes inside a flow through cell and may include pH, specific conductance, dissolved oxygen, oxidation-reduction (redox) potential, temperature, and turbidity. Not all indicators may be used for a specific sampling; staff is most likely to use pH, specific conductivity, temperature, and turbidity.

NOTE: For a detailed discussion of low-flow methods, see USEPA, Office of Research and Development, Office of Solid Waste and Emergency Responses, EPA/540/S-95/504, April 1996, USEPA Ground Water Issue, *Low-Flow (Minimal Drawdown) Ground-Water Sampling Procedures*, Robert Puls and Michael Barcelona

5. Groundwater Sample Collection Procedures

Groundwater samples can be collected using bailers, submersible pumps, inertia pumps, and peristaltic pumps used for purging. Several factors must be considered when choosing a sampling device, and care should be taken when reviewing the advantages or disadvantages of any one device (see **Section 2 Groundwater Sampling Equipment**). It may be appropriate to use a sampling device different than that used to purge. The most common example of this is the use of a submersible pump to purge and a bailer to sample.

The following considerations should be taken during sample collection to prevent contamination:

- Dust and fibers must be kept out of sample bottles.
- The sample cap should never be placed directly on the ground during sampling.
  - If sampling staff must set the sample bottle cap down during sample collection and a second member of the sampling crew (wearing a fresh pair of powderless nitrile gloves) is not available, set the cap on a clean surface (cotton sheeting, HDPE sheeting, triple rinsed cooler lid, etc.).
- Do not sample without powderless nitrile gloves.
- Regular/thick size markers (Sharpie® or otherwise) are to be avoided; as they may contain PFAS.
- Fine and Ultra-Fine point Sharpie® markers are acceptable to label the empty sample bottle while in the staging area provided the lid is on the sample bottle and gloves are changed following sample bottle labeling.
- Ballpoint pens may be used when labeling sample containers. If ballpoint pens do not write on the sample container labels, preprinted labels from the laboratory may be used.
- Hands should be well washed and gloved.
- Use HDPE or polypropylene sample bottles with Teflon®-free caps, provided by the laboratory.
- Commercialy bought sample bottles used with automatic sampling equipment should be decontaminated prior to sampling and equipment blank samples should be collected using laboratory supplied PFAS-free water.
- Glass bottles or containers may be used if they are known to be PFAS-free, however, PFAS have been found to adsorb to glass, especially when the sample is in contact with the glass for a long period of time (e.g. being stored in a glass container). If the sample comes into direct contact with the glass for a short period of time (e.g. using a glass container to collect

the sample, then transferring the sample to a non-glass sample bottle), the adsorption is minimal.

- ■ Bottles should only be opened immediately prior to sampling.
- ■ Bottles should be capped immediately after collecting the sample.
- ■ Samples should be double bagged using resealable low density polyethelene (LDPE) bags (e.g., Ziploc®).
- ■ Follow any guidance or requirements in the PFAS analytical reference method that will be used for testing samples, for sample collection, storage, preservation, and holding times.
- ■ In the absence of formal USEPA guidance for PFAS groundwater sample storage, the documentation in USEPA Method 537 Rev. 1.1 should be used as a guide for thermal preservation (holding temperature) and holding times for groundwater or other samples. Samples must be chilled during storage and shipment and must not exceed 50°F (10° C) during the first 48 hours after collection. Samples stored in the laboratory must be held at or below 50°F (10°C) until extraction but should not be frozen.

NOTE: USEPA Method 537 Rev. 1.1 was developed for the analysis of finished drinking water samples **only**.

- ■ Groundwater samples should be extracted as soon as possible but must be extracted within 14 days. Extracts must be stored at room temperature and analyzed within 28 days after extraction.
- ▲ Off-brand markers should be known to be PFAS free prior to use.
- ▲ Latex gloves should be screened before use.

5.1 Bailers

NOTE: For bailers especially, two sample collection personnel may be needed.

1. Complete purging. Measure the groundwater pH, temperature, and specific conductance using the procedures described in the QAPP.
2. Assemble the appropriate sample containers, and label with appropriate sample labels.
3. Attach a nylon or cotton line to the bailer.
4. Lower the bailer slowly and gently into the well, attempt to minimize contact with the casing, and avoid splashing the bailer into the water. Stop lowering at a point adjacent to the screen.
5. Allow the bailer to fill and then slowly and gently retrieve the bailer from the well. Attempt to minimize contact with the casing, to ensure that flakes of rust or other foreign materials are not knocked into the bailer.
6. Remove the cap from the sample container and keep it in a gloved hand (two sample collection personnel may be needed).
7. Begin slowly pouring groundwater from the bailer into the sample container.
8. Replace the well cap once all sample containers are filled.
9. Cap the sample container tightly, label the container, and place the container in a temperature-controlled carrier.
10. Log all samples in the field logbook and on Monitor Well and Groundwater Data Sheets.
11. Package the samples for transport to the analytical laboratory. Complete chain-of-custody records.
12. Properly dispose of the bailer and line.

5.2 Submersible Pumps (Low-Flow Sampling)

1. Complete purging, keeping the pump approximately in the middle of the screened interval. Measure the groundwater pH, temperature, and specific conductance using the procedures described in the QAPP.
2. Assemble the appropriate sample containers, and label with the appropriate sample labels.
3. Reduce the purge water flow rate to a manageable sampling rate by adjusting the control box or by attaching a gate valve to the tubing (if not already fitted).
4. If the flow rate cannot be adjusted, run the water down the side of a clean jar and fill the sample containers from the jar.
5. Remove the pump and assembly. Dedicate the tubing to the monitoring well.
6. Replace the well cap once all sample containers are filled.
7. Cap the sample container tightly, label the container, and place it in a temperature-controlled carrier.
8. Log all of the samples in the field logbook and/or the Monitor Well and Groundwater Data Sheets.
9. Package the samples for transport to the analytical laboratory. Complete chain-of-custody records.
10. Decontaminate equipment in accordance with **Section 3 Equipment Decontamination**.

5.3 Inertia Pumps

1. Complete purging, keeping the pump approximately in the middle of the screened interval. Measure the groundwater pH, temperature, and specific conductance using the procedures described in the QAPP.
2. Assemble the appropriate sample containers, and label with appropriate sample labels.
3. Manually regulate the flow rate and discharge the sample from the pump outlet directly into the appropriate sample container.
4. Remove the pump from the well.
5. Replace the well cap once all sample containers are filled.
6. Cap the sample container tightly, label the container, and place it in a temperature-controlled carrier.
7. Log all samples in the field logbook and/or the Monitor Well and Groundwater Data Sheets.
8. Transport the samples to the decontamination zone, and package them for transport to the analytical laboratory. Complete chain-of-custody records.
9. Decontaminate equipment in accordance with **Section 3 Equipment Decontamination**.

5.4 Peristaltic Pumps (Low-Flow Sampling)

1. Determine that the indicator parameters (see **Section 4.4**) have stabilized. Complete purging, keeping the pump approximately in the middle of the screened interval. Record indicator parameters at 3-minute intervals.
2. Assemble the appropriate sample containers, and label with appropriate sample labels.
3. Collect samples.
4. Remove the pump and assembly. Dedicate the tubing to the monitoring well or properly dispose.
5. Replace the well cap once all sample containers are filled.
6. Cap the sample container tightly, label the container, and place it in a temperature-controlled carrier.
7. Log all samples in the field logbook and/or the Monitor Well and Groundwater Data Sheets.
8. Package the samples for transport to the analytical laboratory. Complete chain-of-custody records.
9. Decontaminate equipment in accordance with **Section 3 Equipment Decontamination**.

●- Prohibited ■- Allowable ▲- Needs Screening

When the depth to the water table exceeds 25 feet below grade, suction-lift mechanisms, such as peristaltic pumps, cannot be used to sample groundwater. A bladder or submersible pump can be used in the case when groundwater is located deeper than 25 feet below grade. Both of these pumps are submerged beneath the water table and will come into contact with the groundwater being sampled.

6. Field Quality Assurance/Quality Control

Sample blanks and duplicates are the primary means of assuring and assessing quality control during sample collection or transport.

Field blanks consist of:

- **Equipment blanks**
  - Equipment blanks consist of laboratory verified PFAS-free water poured over (for equipment such as static water level indicators) or through (for equipment such as pumps, bailers and flow through cells) the sampling equipment, collected in laboratory-supplied sample containers, and analyzed.
  - Equipment blanks should be collected prior to the first use of sampling equipment in the field (particularly if there is any uncertainty as to whether the equipment is constructed from PFAS containing materials) and occasionally after decontamination.
  - Equipment blanks should be collected from a representative sample of disposable sampling equipment (one bailer from a box, a length of tubing from a roll) to document that these items are not contributing PFAS to groundwater samples.
  - In the field, equipment blanks should be collected at a minimum frequency of one per day (or at a different frequency as specified in the sampling plan).

NOTE: Refer to the specific sampling plan to determine the appropriate number and frequency regarding field quality assurance and quality control.

- **Trip blanks**
  - Trip blanks consist of laboratory-verified PFAS-free water in a laboratory-supplied sample container. Trip blanks travel with the field samples and are analyzed in the same batch.
  - Typically trip blanks are collected to assess the potential cross contamination from VOCs. The current MDEQ minimum analyte PFAS list does not contain PFAS that are volatile.
  - Trip blanks could be used to evaluate the potential cross-contamination present the lab in the containers or deionized water provided from the lab.

- **Field blanks**
  - Field blanks consist of laboratory verified PFAS-free water in a laboratory supplied sample container.
  - A field blank is opened at the sampling site and exposed to ambient conditions for approximately the same amount of time as an actual sampling container (generally 1 to 3 minutes). Alternately, the PFAS—free water can be poured from one sample container into another to mimic sample collection activities. The field blank then travels with the field samples and is analyzed in the same batch.
  - A field blank must be collected once every twenty samples (or at a different frequency as specified in sampling plan) or once during any sampling event, when an ambient source of PFAS (particularly atmospheric) is suspected.
  - If an atmospheric source of PFAS is suspected, collect the equipment blank downwind of the suspected source

- **Field duplicates**
  - Groundwater sample duplicates are two samples collected immediately sequentially from the same well. Duplicate samples should be labeled to prevent anyone, other than the sample collector, from knowing which specific well(s) are being duplicated.
  - Duplicates are analyzed in the same batch and serve as a quality check on the accuracy and precision of sampling procedures.
  - Duplicates are recommended once every ten samples or once per day (whichever is less; or at a different frequency as specified in the sampling plan.

7. Filtration

Filtering of the groundwater samples is sometimes necessary. PFAS can adsorb to particulate matter, and unfiltered samples may result in high biased results. However, the filter material should be carefully evaluated. A study between four different filter materials (PTFE, glass, polyethersulfone [PES], and nylon) found that glass filters adsorbed the least amount of PFAS and nylon adsorbed the most and is therefore not recommended for PFAS sampling.

NOTE: It is recommended that filtering of the samples should **only be performed in the laboratory** in order to reduce the possibility of cross contamination.

The following recommendations should be used when considering filtering of the samples:

- **Field filtration of the sample is generally not advised.**
  - ▲ If filtering is absolutely necessary, if specifically requested by a client or for other reasons:
    - ● Do not use any filters that contain any PFAS, such as PTFE filters
    - ● Do not use nylon filters.
    - ■ Glass filters are recommended to be used.
    - ■ Consider use of a centrifuge in the laboratory to reduce the need for sample filtering.

8. Sample Shipment

Once the sample is collected in laboratory-supplied containers, the following recommendations should be used for sample shipment:

- ■ Check the cooler periodically to ensure samples are well iced and at the proper temperature.

- Refresh with regular ice, if needed, double bagged in LDPE resealable storage bags if needed.
- Regular ice should be used to cool and maintain the sample at or below the proper temperature.
  - ▲ Chemical or blue ice may be used if it is known to be PFAS-free and it is absolutely certain that the sample is cooled and maintained at or below the proper temperature during collection and through transit to the laboratory.
- Complete the appropriate Monitor Well and Groundwater Data Sheets.
- Shipping containers should be packed with enough PFAS-free noncombustible, absorbent, cushioning material, such as bubble wrap, to minimize the possibility of breakage.
- Complete a Chain of Custody (COC) form for each separate shipping container. The forms should be hand-carried to the laboratory by the sampler.
- If unable to hand-carry the COC and other forms to the laboratory, forms should be single bagged in LDPE (e.g. Ziploc®) storage bags and taped to the inside of the cooler lid.
- The cooler should be taped closed with a custody seal and, if shipping, shipped by overnight courier.
- Samples should be shipped as soon as possible (e.g. overnight) to ensure the samples arrive within the analytical holding time specified by the lab.

NOTE: Chain-of-custody procedures must be followed and documented.

[THIS PAGE IS INTENTIONALLY LEFT BLANK]

Michigan Department of Environmental Quality

MDEQ PFAS Sampling Quick Reference Field Guide[1]

All Items Used During Sampling Event

● Prohibited
• Items or materials that contain fluoropolymers such as o Polytetrafluoroethylene (PTFE), that includes the trademarks Teflon® and Hostaflon® o Polyvinylidene fluoride (PVDF), that includes the trademark Kynar® o Polycholotrifluoroethylene (PCTFE), that includes the trademark Neoflon ® o Ethylene-tetrafluoro-ethylene (ETFE), that includes the trademark Tefzel® o Fluorinated ethylene propylene (FEP), that includes the trademarks Teflon® FEP and Hostaflon® FEP • Items or materials that contain any other fluoropolymer

Pumps, Tubing, and Sampling Equipment

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Items or materials containing any fluoropolymer (potential items include tubing, valves, or pipe thread seal tape)	• High-density polyethylene (HDPE) • Low-density polyethylene (LDPE) tubing • Polypropylene • Silicone • Stainless-steel • Any items used to secure sampling bottles made from: o Natural rubber o Nylon (cable ties) o Uncoated metal springs o Polyethylene	• Any items or materials that will come into direct contact with the sample that have **not** been verified to be PFAS-free o Do not assume that any sampling items or materials are PFAS-free based on composition alone

Sample Storage and Preservation

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Polytetrafluoroethylene (PTFE): Teflon® lined bottles or caps	• Glass jars[4] • Laboratory-provided PFAS-Free bottles: o HDPE or polypropylene • Regular wet ice • Thin HDPE sheeting • LDPE resealable storage bags (i.e. Ziploc®) that will not contact the sample media[6]	• Aluminium foil[4] • Chemical or blue ice[5] • Plastic storage bags other than those listed as ■ Allowable • Low-density polyethylene (LDPE) bottles

Field Documentation

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Clipboards coated with PFAS • Notebooks made with PFAS treated paper • PFAS treated loose paper • PFAS treated adhesive paper products	• Loose paper (non-waterproof, non-recycled) • Rite in the Rain® notebooks • Aluminium, polypropylene, or Masonite field clipboards • Ballpoint pens, pencils, and Fine or Ultra-Fine Point Sharpie® markers	• Plastic clipboards, binders, or spiral hard cover notebooks • All markers not listed as ■ Allowable • Post-It® Notes or other adhesive paper products • Waterproof field books

Decontamination

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Decon 90® • PFAS treated paper towel	• Alconox®, Liquinox®, or Citranox® • Triple rinse with PFAS-free deionized water • Cotton cloth or untreated paper towel	• Municipal water • Recycled paper towels or chemically treated paper towels

Clothing, Boots, Rain Gear, and PPE

● Prohibited	■ Allowable	▲Needs Screening[2]
• New or unwashed clothing • Anything made of or with: o Gore-Tex™ or other water-resistant synthetics • Anything applied with or recently washed with: o Fabric softeners o Fabric protectors, including UV protection o Insect resistant chemicals o Water, dirt, and/or stain resistant chemicals	• Powderless nitrile gloves • Well-laundered synthetic or 100% cotton clothing, with most recent launderings not using fabric softeners • Made of or with: o Polyurethane o Polyvinyl chloride (PVC) o Wax coated fabrics o Rubber / Neoprene o Uncoated Tyvek®	• Latex gloves • Water and/or dirt resistant leather gloves • Any special gloves required by a HASP • Tyvek® suits, clothing that contains Tyvek®, or coated Tyvek®

Food and Beverages

● Prohibited	■ Allowable
• No food should be consumed in the staging or sampling areas, including pre-packaged food or snacks. ■ If consuming food on-site becomes necessary, move to the staging area and remove PPE. After eating, wash hands thoroughly and put on new PPE.	• Brought and consumed only outside the vicinity of the sampling area: o Bottled water o Hydration drinks (i.e. Gatorade®, Powerade®)

Personal Care Products (PCPs) - for day of sample collection[6]

● Prohibited	■ Allowable	▲Needs Screening[2]
• Any PCPs[6], sunscreen, and insect repellent applied in the sampling area.	PCPs[6], sunscreens, and insect repellents applied in the staging area, away from sampling bottles and equipment followed by thoroughly washing hands: **PCPs[6]:** • Cosmetics, deodorants/antiperspirants, moisturizers, hand creams, and other PCPs[6] **Sunscreens:** • Banana Boat® for Men Triple Defense Continuous Spray Sunscreen SPF 30 • Banana Boat® Sport Performance Coolzone Broad Spectrum SPF 30 • Banana Boat® Sport Performance Sunscreen Lotion Broad Spectrum SPF 30 • Banana Boat® Sport Performance Sunscreen Stick SPF 50 • Coppertone® Sunscreen Lotion Ultra Guard Broad Spectrum SPF 50 • Coppertone® Sport High Performance AccuSpray Sunscreen SPF 30 • Coppertone® Sunscreen Stick Kids SPF 55 • L'Oréal® Silky Sheer Face Lotion 50 • Meijer® Clear Zinc Sunscreen Lotion Broad Spectrum SPF 50 • Meijer® Sunscreen Continuous Spray Broad Spectrum SPF 30 • Meijer® Clear Zinc Sunscreen Lotion Broad Spectrum SPF 15, 30 and 50 • Meijer® Wet Skin Kids Sunscreen Continuous Spray Broad Spectrum SPF 70 • Neutrogena® Beach Defense Water+Sun Barrier Lotion SPF 70 • Neutrogena® Beach Defense Water+Sun Barrier Spray Broad Spectrum SPF 30 • Neutrogena® Pure & Free Baby Sunscreen Broad Spectrum SPF 60+ • Neutrogena® UltraSheer Dry-Touch Sunscreen Broad Spectrum SPF 30 **Insect Repellents:** • OFF® Deep Woods • Sawyer® Permethrin	• Products other than those listed as ■Allowable

[1] This table is not considered to be a complete listing of prohibited or allowable materials. All materials should be evaluated prior to use during sampling. The manufacturers of various products should be contacted in order to determine if PFAS was used in the production of any particular product.

[2] Equipment blank samples should be taken to verify these products are PFAS-free prior to use during sampling.

[3] **For surface water foam samples:** LDPE storage bags may be used in the sampling of foam on surface waters. In this instance, it is allowable for the LDPE bag to come into direct contact with the sample media.

[4] **For fish and other wildlife samples:** Depending on the project objectives, glass jars and aluminum foil might be used for PFAS sampling. PFAS has been found to bind to glass and if the sample is stored in a glass jar, a rinse of the jar is required during the sample analysis. PFAS are sometimes used as a protective layer for some aluminum foils. An equipment blank sample should be collected prior to any aluminum foil use.

[5] Regular ice is recommended as there are concerns that chemical and blue ice may not cool and maintain the sample at or below 42.8˚F (6°C) (as determined by EPA 40 CFR 136 – NPDES) during collection and through transit to the laboratory.

[6] Based on evidence, avoidance of PCPs is considered to be precautionary because none have been documented as having cross-contaminated samples due to their use. However, if used, application of PCPs must be done at the staging area and away from sampling bottles and equipment, and hands must be thoroughly washed after the use of any PCPs prior to sampling.

●- Prohibited ■- Allowable ▲- Needs Screening

Attachment C

Michigan Department of Environmental Quality
Soil PFAS Sampling Guidance

Michigan Department of Environmental Quality

SOIL PFAS SAMPLING

Guidance

Introduction

This guidance document discusses the processes, decontamination procedures, and acceptable items and materials for sampling soil for per- and polyfluoroalkyl substances (PFAS). In addition, this guidance will be used to support the sampling objectives and procedures based on any Quality Assurance Project Plan (QAPP) developed prior to sampling activities. This guidance assumes staff has basic familiarity with and/or understanding of basic soil sampling procedures.

NOTE: Review the General PFAS Sampling Guidance prior to reviewing this guidance document.

The Michigan Department of Environmental Quality (DEQ) intends to update the information contained within this PFAS Sampling Guidance document as new information becomes available. The user of this PFAS Sampling Guidance is encouraged to visit the Michigan PFAS Action Response Team webpage (www.michigan.gov/PFASresponse) to access the current version of this document.

Because PFAS compounds can be analyzed at concentrations in the parts per trillion (ppt) range, precautions must be taken to prevent cross-contamination. Field sampling equipment, either rented or not, that is used at multiple sites or sampling locations (also described as non-dedicated equipment), could become highly contaminated with PFAS. If site-specific information is available, sampling should be conducted from the least to the most contaminated locations. Additional guidance on the sampling sequence can be found in **Section 4.3.3** of the **General PFAS Sampling Guidance**.

Soil sampling involves the use of non-dedicated equipment, such as scoops, trowels, shovels, augers and other drilling-related equipment, which could be a source of cross-contamination. Decontamination procedures outlined in this guidance document should be followed to avoid cross contamination and equipment should be verified as PFAS-free.

The site-specific quality assurance document will generally provide the following information:

- Sample collection objectives.
- Locations, number, and volume of samples.
- Types of chemical analyses.
- Specific quality control procedures.
- Additional sampling requirements, as necessary.

This soil sampling guidance document discusses the collection of surface and sub-surface soil samples for PFAS and methods to prevent cross-contamination that can occur from:

- Field clothing and personal protection equipment (PPE)
- Sampling equipment
- Equipment decontamination
- Sample collection and handling
- Sample shipment

Contents

NOTE: Additional information about PFAS testing can be found on the Michigan PFAS Action Response Team (MPART) website: www.michigan.gov/PFASresponse

● - Prohibited ■ – Allowable ▲ - Needs Screening

1. Potential Sources for PFAS Cross-Contamination

Potential sources for PFAS cross-contamination include items and materials used within the sampling environment, such as sampling equipment, field clothing, personal protective equipment (PPE), sun and biological protection products, personal hygiene, personal care products (PCPs), and food packaging. A detailed discussion about potential sources for PFAS cross-contamination is included in the **General PFAS Sampling Guidance**, which should be reviewed before reading this document. However, a high-level summary is presented in this guidance.

All of the items and materials discussed in each of the MDEQ's PFAS Sampling Guidance Documents are divided into three major groups:

- Prohibited (●) identifies items and materials that should not be used when sampling. It is well documented that they contain PFAS or that PFAS are used in their manufacture.

- Allowable (■) identifies items and materials that have been proven not to be sources of PFAS cross contamination and are considered acceptable for sampling.

- Needs Screening (▲) identifies items and materials that have the potential for PFAS cross-contamination due to a lack of scientific data or statements from manufacturers to prove otherwise. These items and materials are further sub-divided into two categories:

    - **Category 1:** Items and materials that <u>will come in direct contact</u> with the sample. These should not be used when sampling unless they are known to be PFAS-free, by collecting an equipment blank sample prior to use.

    - **Category 2:** Items and materials that <u>will not come in direct contact</u> with the sample. These should be avoided, if possible, unless they are known to be PFAS-free by collecting an equipment blank sample prior to use.

Please note that at this time no published research is available that documents the use of various materials and effect on sample results. Therefore, a conservative approach is recommended, and the guidance is based on the collection of multiple environmental samples at various PFAS Sites. Sampling staff should take practical and appropriate precautions to avoid items that are likely to contain PFAS at the sampling site as well as avoid specific items during the sampling event.

A general overview of PFAS contamination sources during sampling can be found in **Section 4.2** of the **General PFAS Sampling Guidance**. Any items or materials utilized that are not identified in this guidance or not discussed in **Section 4.2** should be evaluated as described in **Section 4.2.1**.

Sampling staff should take practical and appropriate precautions to avoid items that are likely to contain PFAS at the sampling site as well as avoid specific items during the sampling event (see below).

1.1 Field Clothing and Personal Protection Equipment (PPE)

A general overview of field clothing and PPE can be found in **Section 4.2.2** from the **General PFAS Sampling Guidance**. Materials, field clothing, and equipment screening should be performed during the QAPP development or the planning phase of sampling programs. The screening should be performed on all items and materials that are expected to come into contact with the samples and are defined as **Category 1**. This Soil Sampling Guidance assumes that the soil samples will be collected in an environment where only Level D protection (such as steel toe

NOTE: Both field clothing and PPE should be kept dust and fiber free.

boots, eye protection, hardhat, etc.) is required by the Health and Safety Plan (HASP). During a PFAS investigation, PPE that contains PFAS should be avoided to prevent cross-contamination.

As with any field mobilization, it is the responsibility of all personnel to be aware of the physical, chemical, and biological hazards associated with a particular site. Personal safety is paramount. Any deviation from this guidance, including those necessary to ensure the health and safety of sampling personnel, should be recorded in field notes and discussed in the final report. Any additional field clothing and/or PPE items that might be required for the soil sampling and not discussed in the Sampling Guidance should be evaluated as described in **Sections 4.2.1** and **4.2.2** of the **General PFAS Sampling Guidance**.

Field sampling during wet weather (e.g., rainfall and snow) should be conducted while wearing the proper field clothing.

- Dust and fibers must not be allowed to collect on field clothing or PPE.
- Do not use clothing that has been advertised as waterproof, dirt and/or stain repellant that has not been verified to be made of PFAS-free materials.
- Only use clothing/PPE that has been verified to be made of PFAS-free materials.

Powderless nitrile gloves should be changed frequently any time there is an opportunity for cross-contamination. See **Section 6** of this guidance for additional glove instructions.

1.2 Personal Care Products (PCPs)

A number of sampling guidance documents recommend that personal hygiene and personal care products (PCPs) (e.g., cosmetics, shampoo, sunscreens, dental floss, etc.) not be used prior to and on the day(s) of sampling because the presence of PFAS in these products has been documented (OECD, 2002, Fujii, 2013, Borg and Ivarsson, 2017). However, if the MDEQ's sampling SOPs are followed, these items should not come into contact with the sampling equipment or the sample being collected. As of the date of this sampling guidance, cross-contamination of samples due to the use of PCPs has not been documented during the collection of thousands of samples. However, field personnel should be aware of the potential of cross-contamination if the sampling equipment or actual samples would come into contact with these products.

The following precautions should be taken when dealing with personal hygiene or PCPs before sampling:

- Do not handle or apply PCPs in the sampling area.
- Do not handle or apply PCPs while wearing PPE that will be present during sampling.
- Move to the staging area and remove PPE if applying personal care products becomes necessary.
- Wash hands thoroughly after the handling or application of PCPs and, when finished, put on a fresh pair of powderless nitrile gloves.

1.3 Food Packaging

PFAS has been used by the paper industry as a special protective coating against grease, oil, and water for paper and paperboards, including food packaging since the late 1950s (Trier et al., 2018). PFAS application for food packaging includes paper products that come into contact with food such as paper plates, food containers, bags, and wraps (OECD, 2002). Pre-wrapped food or snacks (such as candy bars, microwave popcorn, etc.) must not be in the sampling and staging areas during

sampling due to PFAS contamination of the packaging. When staff requires a break to eat or drink, they should remove their gloves, coveralls, and any other PPE, if worn, in the staging area and move to the designated area for food and beverage consumption. When finished, staff should wash their hands and put on a fresh pair of powderless nitrile gloves at the staging area, before returning to the sampling area.

- Do not handle, consume, or otherwise interact with pre-wrapped food or snacks, carry-out food, fast food, or other food items while on-site during sampling.
- Move to the staging area and remove PPE prior to leaving the sampling and staging areas if consuming food on site becomes necessary.

2. Soil Sampling Equipment

Soil sampling equipment is categorized into **Category 1** and **Category 2:**

NOTE: As a precautionary action, an equipment rinsate blank should be collected even if the sampling materials are made of materials that are not expected to contain PFAS.

Category 1: Any item that will directly contact with the soil, including shovels, trowels, spoons, bowls, hand augers buckets and extensions, and augers and direct push equipment, including any split spoon or sampling barrels. This equipment has a high likelihood of cross-contamination occurring if the proper decontamination procedures are not followed. These items should be known to be PFAS free.

Category 2: Any item that will not directly contact the soil, including field books, Munsell® color charts, Post-It® Notes, aluminum foil, and recycled paper towels.

Although these items will not directly contact soil samples, cross-contamination may still occur. Every effort should be made to ensure these items are PFAS-free. Be aware that surfaces of this field equipment or the containers in which they are kept may contain PFAS.

Do not use any equipment that contains any known fluoropolymers or that potentially has been cross-contamination with PFAS such as, but not limited to:

- Do not use Polytetrafluoroethylene (PTFE) that includes the trademark Teflon® and Hostaflon®, which can be found in many items, including but not limited to the lining of some hoses and tubing, some wiring, certain kinds of gears, and some objects that require the sliding action of parts.
- Do not use Polyvinylidene fluoride (PVDF) that includes the trademark Kynar®, which can be found in many items, including but not limited to tubing, films/coatings on aluminum, galvanized or aluminized steel, wire insulators, and lithium-ion batteries.
- Do not use Polychlorotrifluoroethylene (PCTFE), that includes the trademark Neoflon®, which can be found in many items, including but not limited to valves, seals, gaskets, and food packaging.
- Do not use Ethylene-tetrafluoro-ethylene (ETFE) that includes the trademark Tefzel®, which can be found in many items, including but not limited to wire and cable insulation and covers, films for roofing and siding, liners in pipes, and some cable tie wraps.
- Do not use Fluorinated ethylene propylene (FEP), that includes the trademarks Teflon® FEP and Hostaflon® FEP,

NOTE: Manufacturers can change the chemical composition of any product. As a result, all materials that will come into contact with the sample matrices (defined as Category 1) should be tested to confirm they are "PFAS-free", i.e. will not contaminate samples at detectable levels. **There is no guarantee that materials in the 'Allowable' category will always be PFAS-free.**

●- Prohibited ■ – Allowable ▲- Needs Screening

and may also include Neoflon®, which can be found in many items, including but not limited to wire and cable insulation and covers, pipe linings, and some labware.

- ● Do not use low density polyethylene (LDPE) for any items that will come into **direct contact** with the sample media. LDPE can be found in many items, including but not limited to containers and bottles, plastic bags, and tubing.
  - ▲ **However**, LDPE may be used if an equipment blank has confirmed it to be PFAS-free. LDPE does not contain PFAS in the raw material but may contain PFAS cross-contamination from the manufacturing process.
- ■ LDPE bags (e.g. Ziploc®) that **do not** come into direct contact with the sample media and do not introduce cross-contamination with samples may be used.
- ■ Use items and materials that are either made of high density polyethylene (HDPE), polypropylene, silicone, or acetate.
- ▲ Post-It® Notes should be screened before use.

Staff should follow the **MDEQ PFAS Sampling Quick Reference Field Guide** table for approved and prohibited items for documenting and sampling residential wells for PFAS.

NOTE: Special care and consideration should be given to the field sampling equipment when stored and handled outside the site boundaries or between different sample locations.

Many times, the release of PFAS in the environment occurs concurrently with other chemicals. For example, the release of PFAS present in the aqueous film forming foam (AFFF) is generally associated with the release of flammable liquids, such as jet fuels. As a result, sampling soil for PFAS may occur within plumes of volatile organic compounds (VOCs). For staff protection, the use of a photoionization detector (PID) is recommended to measure VOCs that might be present in the soil. The PID used during PFAS sampling to screen for VOCs may be made of materials that contain PFAS. However, the PID is a **Category 2** field equipment item and will have a very low possibility of cross contamination.

3. Soil Sampling Methods

Soils are usually sampled to define the subsurface geology and presence of aquifers or aquitards (lithology), or to determine the presence or absence of contaminants—in this case, PFAS (chemical analysis).

3.1 Soil Sampling for Lithologic Description

Soil samples are collected to determine the lithologic and physical makeup of the sample (i.e.: clay, sand, gravel, brown, mottled, etc.). This is done to determine the subsurface geologic stratigraphy of the site and help identify possible aquifers and aquitards in the subsurface. Soil can be collected loose or cored.

3.1.1 Loose Soil Samples

A loose soil sample is usually obtained by auger or rotary drilling processes, where the process delivers loose drilled soil to the surface for collection and interpretation. In the auger drilling process, the auger flights deliver soil cuttings to the surface around the auger string. These soils can be collected by a shovel and bagged in LDPE bags (e.g. Ziploc) or piled for later lithologic analysis and entry into a geologic log.

3.1.2 Cored Soil Samples

A cored soil sample is collected with a coring type of mechanism in a way that preserves the soil structure. Most coring mechanisms consist of a steel core barrel with a clear plastic liner (use an acetate or other PFAS-free liner) into which the soil core enters. Once the core barrel is retrieved at the surface, this liner is removed and cut open. The soil core is then sliced open to reveal a clean face. This clean face is examined for lithology and structure.

3.2 Soil Sampling for Chemical Analysis

Soils collected for chemical analysis are usually collected by using the core soil sample method. The soil samples need to be as undisturbed as possible. The requirement of an undisturbed soil sample **excludes** the use of loose auger cuttings or rotary methods of soil collection.

During the soil sampling process, the soil sampling device is removed from the ground. The liner is removed and placed on the cutting board and opened using a liner cutting device. The soil sample is visually inspected, and observations recorded in the site field book. The core is cut open to reveal a "clean" face for sampling. This process avoids the possibility of picking up any contaminants that may have gotten smeared onto the soil surface as the soil core entered the liner.

4. Equipment Decontamination Before Sampling

It is customary with soil sampling that the equipment is decontaminated at the conclusion of the sampling event. If the previous user of the equipment is not known, and it is unclear how the equipment was handled—especially rental equipment—decontaminate the equipment prior to sampling.

Disposable **Category 1** sampling equipment should be used, especially for sample bottles and other materials that are used where the soil sample may be in contact with the sampling equipment for an extended period of time. Field sampling equipment used at multiple sites or sampling locations can become highly contaminated with PFAS. Decontamination procedures should be implemented to prevent cross-contamination, including between individual sample locations.

For non-dedicated **Category 1** sampling equipment, the following items, materials, and procedures should be used for decontamination:

- ● Do not use Decon 90®.
- ■ Laboratory supplied PFAS-free deionized water is preferred for decontamination.
- ■ Alconox®, Liquinox®, and Citranox® can be used for equipment decontamination.
- ■ Sampling equipment can be scrubbed using a polyethylene or Polyvinyl chloride (PVC) brush to remove particulates.
- ■ Decontamination procedures should include triple rinsing with PFAS-free water.
- ■ Commercially available deionized water in an HDPE container may be used for decontamination if the water is verified to be PFAS-free.
- ▲ Municipal drinking water may be used for decontamination purposes if it is known to be PFAS-free.

NOTE: All samples should be collected using PFAS-free High-Density Polyethylene (HDPE), glass, or polypropylene bottles provided by the laboratory, with Teflon®-

● - Prohibited ■ – Allowable ▲ - Needs Screening

5. Sample Collection and Handling

The following considerations should be observed for sample collection:

- ● Dust and fibers must be kept out of sample bottles.
- ● The sample cap should never be placed directly on the ground during sampling.
  - ▲ If sampling staff must set the sample bottle cap down during sample collection and a second member of the sampling crew (wearing a fresh pair of powderless nitrile gloves) is not available, set the cap on a clean surface (cotton sheeting, HDPE sheeting, triple rinsed cooler lid, etc.).
- ● Do not sample without powderless nitrile gloves.
- ● Regular size Sharpie® are to be avoided. Thicker markers may contain PFAS.
- ■ Fine and Ultra-Fine point Sharpie® markers are acceptable.
- ■ Ballpoint pens may be used when labeling sample containers. If ballpoint pens do not write on the sample container labels, preprinted labels from the laboratory may be used.
- ■ Bottles should only be opened immediately prior to sampling.
- ■ Hands should be well washed and gloved.
- ■ Use HDPE, glass, or polypropylene sample bottles with Teflon®-free caps, provided by the laboratory.
- ■ Glass bottles or containers may be used if they are known to be PFAS-free, however, PFAS have been found to adsorb to glass, especially when the sample is in contact with the glass for a long period of time (e.g. being stored in a glass container). If the sample comes into direct contact with the glass for a short period of time (e.g. using a glass container to collect the sample, then transferring the sample to a non-glass sample bottle), the adsorption is minimal.
- ■ Commercially bought sample bottles used with automatic sampling equipment should be decontaminated prior to sampling and equipment blank samples should be collected using laboratory supplied PFAS-free water.
- ■ Samples should be double bagged using resealable low density polyethelene (LDPE) bags (e.g., Ziploc®).
- ■ Follow any guidance or requirements in the PFAS analytical reference method that will be used for testing samples, for sample collection, storage, preservation, and holding times.
- ■ If a published testing method is not used, and in the absence of formal United States Environmental Protection Agency (USEPA) guidance for PFAS sample storage, the documentation in USEPA Method 537 Rev. 1.1 should be used as a guide for thermal preservation (holding temperature) and holding times for soil or other samples. Samples must be chilled during storage and shipment and must not exceed 50°F (10° C) during the first 48 hours after collection.
- ▲ Latex gloves should be screened before use.

NOTE: USEPA Method 537 Rev. 1.1 was developed for the analysis of finished drinking water samples only. It was not designed for soils or other matrices that could cause significant interferences to the method. Other analytical methods such as ASTM D7968-14 or D7968-17a may be better at resolving interferences in soil samples. These methods were developed specifically for other matrices such as soil and sediments.

If site-specific information is available, sampling should be conducted from the least to the most contaminated location. Additional guidance on the sampling sequence can be found in **Section 4.3.3** of the **General PFAS Sampling Guidance**.

If possible, collect PFAS samples prior to collecting non-PFAS samples or field parameters (pH, temperature, etc.).

●- Prohibited ■ – Allowable ▲- Needs Screening

Powderless nitrile gloves should be changed any time there is an opportunity for cross-contamination during sampling, including, but not limited to:

- Immediately prior to sample collection
- Each time sampling equipment is placed in and then removed from soil at a new location
- Handling of any sample, including quality assurance/quality control (QA/QC) samples
- After the handling of any non-dedicated sampling equipment
- After contact with non-decontaminated surfaces
- After decontamination of sampling equipment
- When judged necessary by field personnel

6. Sample Shipment

The following procedures should be used for sample shipment:

- ■ Regular ice should be used to cool and maintain the sample at or below 42.8°F (6°C).
  - ▲ Chemical or blue ice may be used if it is known to be PFAS-free and it is absolutely certain that the sample is cooled and maintained at or below 42.8°F (6°C) during collection and through transit to the laboratory.
- ■ Check the cooler periodically to ensure samples are well iced and at the proper temperature.
- ■ Refresh with regular ice, if needed, double bagged in LDPE resealable storage bags if needed.
- ■ Chain of Custody and other forms should be single bagged in LDPE (e.g. Ziploc®) storage bags and taped to the inside of the cooler lid.
- ■ The cooler should be taped closed with a custody seal and shipped by overnight courier.
- ■ Samples should be shipped as soon as possible (e.g. overnight) to ensure the samples arrive within the analytical holding time specified by the lab.

7. Equipment Decontamination After Sampling

It is customary to decontaminate soil sampling equipment at the end of the sampling event, whether it is a single sampling location or the conclusion of the workday. This is to ensure sampling equipment is decontaminated ahead of time for the next sampling event.

- ● Do not put equipment away without decontaminating it.
- ■ Do decontaminate sampling equipment after sampling at each location, or at the end of the workday. Follow the decontamination guidelines in **Section 4 (Equipment Decontamination Before Sampling)** of this document.

[THIS PAGE IS INTENTIONALLY LEFT BLANK]

Michigan Department of Environmental Quality

MDEQ PFAS Sampling Quick Reference Field Guide[1]

All Items Used During Sampling Event

● Prohibited
• Items or materials that contain fluoropolymers such as o Polytetrafluoroethylene (PTFE), that includes the trademarks Teflon® and Hostaflon® o Polyvinylidene fluoride (PVDF), that includes the trademark Kynar® o Polycholotrifluoroethylene (PCTFE), that includes the trademark Neoflon ® o Ethylene-tetrafluoro-ethylene (ETFE), that includes the trademark Tefzel® o Fluorinated ethylene propylene (FEP), that includes the trademarks Teflon® FEP and Hostaflon® FEP • Items or materials that contain any other fluoropolymer

Pumps, Tubing, and Sampling Equipment

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Items or materials containing any fluoropolymer (potential items include tubing, valves, or pipe thread seal tape)	• High-density polyethylene (HDPE) • Low-density polyethylene (LDPE) tubing • Polypropylene • Silicone • Stainless-steel • Any items used to secure sampling bottles made from: o Natural rubber o Nylon (cable ties) o Uncoated metal springs o Polyethylene	• Any items or materials that will come into direct contact with the sample that have **not** been verified to be PFAS-free o Do not assume that any sampling items or materials are PFAS-free based on composition alone

Sample Storage and Preservation

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Polytetrafluoroethylene (PTFE): Teflon® lined bottles or caps	• Glass jars[4] • Laboratory-provided PFAS-Free bottles: o HDPE or polypropylene • Regular wet ice • Thin HDPE sheeting • LDPE resealable storage bags (i.e. Ziploc®) that will not contact the sample media[6]	• Aluminium foil[4] • Chemical or blue ice[5] • Plastic storage bags other than those listed as ■ Allowable • Low-density polyethylene (LDPE) bottles

Field Documentation

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Clipboards coated with PFAS • Notebooks made with PFAS treated paper • PFAS treated loose paper • PFAS treated adhesive paper products	• Loose paper (non-waterproof, non-recycled) • Rite in the Rain® notebooks • Aluminium, polypropylene, or Masonite field clipboards • Ballpoint pens, pencils, and Fine or Ultra-Fine Point Sharpie® markers	• Plastic clipboards, binders, or spiral hard cover notebooks • All markers not listed as ■ Allowable • Post-It® Notes or other adhesive paper products • Waterproof field books

Decontamination

● Prohibited	■ Allowable	▲ Needs Screening[2]
• Decon 90® • PFAS treated paper towel	• Alconox®, Liquinox®, or Citranox® • Triple rinse with PFAS-free deionized water • Cotton cloth or untreated paper towel	• Municipal water • Recycled paper towels or chemically treated paper towels

Clothing, Boots, Rain Gear, and PPE

● Prohibited	■ Allowable	▲Needs Screening[2]
• New or unwashed clothing • Anything made of or with: o Gore-Tex™ or other water-resistant synthetics • Anything applied with or recently washed with: o Fabric softeners o Fabric protectors, including UV protection o Insect resistant chemicals o Water, dirt, and/or stain resistant chemicals	• Powderless nitrile gloves • Well-laundered synthetic or 100% cotton clothing, with most recent launderings not using fabric softeners • Made of or with: o Polyurethane o Polyvinyl chloride (PVC) o Wax coated fabrics o Rubber / Neoprene o Uncoated Tyvek®	• Latex gloves • Water and/or dirt resistant leather gloves • Any special gloves required by a HASP • Tyvek® suits, clothing that contains Tyvek®, or coated Tyvek®

Food and Beverages

● Prohibited	■ Allowable
• No food should be consumed in the staging or sampling areas, including pre-packaged food or snacks. ■ If consuming food on-site becomes necessary, move to the staging area and remove PPE. After eating, wash hands thoroughly and put on new PPE.	• Brought and consumed only outside the vicinity of the sampling area: o Bottled water o Hydration drinks (i.e. Gatorade®, Powerade®)

Personal Care Products (PCPs) - for day of sample collection[6]

● Prohibited	■ Allowable	▲Needs Screening[2]
• Any PCPs[6], sunscreen, and insect repellent applied in the sampling area.	PCPs[6], sunscreens, and insect repellents applied in the staging area, away from sampling bottles and equipment followed by thoroughly washing hands: **PCPs[6]:** • Cosmetics, deodorants/antiperspirants, moisturizers, hand creams, and other PCPs[6] **Sunscreens:** • Banana Boat® for Men Triple Defense Continuous Spray Sunscreen SPF 30 • Banana Boat® Sport Performance Coolzone Broad Spectrum SPF 30 • Banana Boat® Sport Performance Sunscreen Lotion Broad Spectrum SPF 30 • Banana Boat® Sport Performance Sunscreen Stick SPF 50 • Coppertone® Sunscreen Lotion Ultra Guard Broad Spectrum SPF 50 • Coppertone® Sport High Performance AccuSpray Sunscreen SPF 30 • Coppertone® Sunscreen Stick Kids SPF 55 • L'Oréal® Silky Sheer Face Lotion 50 • Meijer® Clear Zinc Sunscreen Lotion Broad Spectrum SPF 50 • Meijer® Sunscreen Continuous Spray Broad Spectrum SPF 30 • Meijer® Clear Zinc Sunscreen Lotion Broad Spectrum SPF 15, 30 and 50 • Meijer® Wet Skin Kids Sunscreen Continuous Spray Broad Spectrum SPF 70 • Neutrogena® Beach Defense Water+Sun Barrier Lotion SPF 70 • Neutrogena® Beach Defense Water+Sun Barrier Spray Broad Spectrum SPF 30 • Neutrogena® Pure & Free Baby Sunscreen Broad Spectrum SPF 60+ • Neutrogena® UltraSheer Dry-Touch Sunscreen Broad Spectrum SPF 30 **Insect Repellents:** • OFF® Deep Woods • Sawyer® Permethrin	• Products other than those listed as ■Allowable

[1] This table is not considered to be a complete listing of prohibited or allowable materials. All materials should be evaluated prior to use during sampling. The manufacturers of various products should be contacted in order to determine if PFAS was used in the production of any particular product.

[2] Equipment blank samples should be taken to verify these products are PFAS-free prior to use during sampling.

[3] **For surface water foam samples:** LDPE storage bags may be used in the sampling of foam on surface waters. In this instance, it is allowable for the LDPE bag to come into direct contact with the sample media.

[4] **For fish and other wildlife samples:** Depending on the project objectives, glass jars and aluminum foil might be used for PFAS sampling. PFAS has been found to bind to glass and if the sample is stored in a glass jar, a rinse of the jar is required during the sample analysis. PFAS are sometimes used as a protective layer for some aluminum foils. An equipment blank sample should be collected prior to any aluminum foil use.

[5] Regular ice is recommended as there are concerns that chemical and blue ice may not cool and maintain the sample at or below 42.8°F (6°C) (as determined by EPA 40 CFR 136 – NPDES) during collection and through transit to the laboratory.

[6] Based on evidence, avoidance of PCPs is considered to be precautionary because none have been documented as having cross-contaminated samples due to their use. However, if used, application of PCPs must be done at the staging area and away from sampling bottles and equipment, and hands must be thoroughly washed after the use of any PCPs prior to sampling.

●- Prohibited ■- Allowable ▲- Needs Screening