To: PST Reimbursement & PST RPR Staff  Date: Jan 10, 2001

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Subject: Standard Operating Procedure for Evaluation of Costs of Sampling & Analysis of Groundwater Samples for Monitor Wells with Water Levels Above the Top of the Wellscreen

Costs for sampling and laboratory analysis of properly collected and analyzed groundwater samples should be eligible for reimbursement. This SOP addresses those situations where groundwater is above the top of the wellscreen of monitor wells that have been properly sited and completed in accordance with RG-19 and RG-175 and other relevant sources.

Shallow Wellscreen - When wells are screened as shallow as possible (Note 1) (approximately 2.5 to 3 feet below grade), water samples can be properly collected and analyzed when the water level is above the top of the wellscreen.

Other Wells - When water levels are above the top of the wellscreen, water samples can be properly collected and analyzed if either:

a) confined groundwater conditions have been documented (Note 2);

b) static water levels are within the sand pack interval of the well and well purging brings the water level within the screened interval; or

c) other site-specific situations for which supporting documentation must be submitted to the TNRCC to show that representative samples have been collected (e.g., a site was impacted by unseasonably heavy rainfall during a particular monitoring period). The TNRCC must approve the justification to be reimbursable.

Note 1 - Assuming that installation of shallow-well screens are warranted due to site conditions.

Note 2 - Confined conditions are typically documented with the installation of a shallow boring or twin well, which is completed and screened in the zone above the existing monitor well. If water is not present in the shallow boring or twin well, confined conditions are present at the site.