

NJDEP Technical Guidance Document Review Form

Document: "FSPM Chapter 10 - Documentation "

Comment Period: July 26, 2023 to September 8, 2023

NJDEP Committee Chairperson: Crystal Pirozek

Comment #	Page	Section	Subsection	COMMENTS	RESPONSE
1	2	10.1		Link to TRSR (https://www.nj.gov/dep/rules/rules/njac7_26e.pdf) needs to be updated.	Link updated
2	2	10.1		Site Remediation Program should be changed to CSRR.	In this Section it is referring to the name of a document (SRP-EDI), not the program.
3	2	10.1		Link to Electronic Data Interchange (https://www.state.nj.us/dep/srp/regs/srpedi) needs to be updated.	Link updated
4	2	10.1		The reasons given for proper sample documentation appear to be primarily legal and indicate sampling tracking, etc. as well as for enforcement purposes. This represents a very narrow view. Appropriate field documentation (e.g. field notes, photo logs) is critical as a basis for doing good science. Documentation in terms of notes, boring logs, photos and other supporting data are critical as a basis for technical conclusions drawn from the data that will ultimately influence and justify remedial action selection. On most sites NJDEP will use this information as the basis for agreeing or disagreeing with an LSRP's position on how to address environmental and human health risks. Moreover, such documentation is critical in cases as a basis of agreement on facts when the ultimate remedial action decision is negotiated between NJDEP and other parties, such as under an Administrative Order of Consent.	Added text
5	2	10.1		EPA, OSHA are used without first defining the acronym.	Agreed to change
6	2	10.1		1st Paragraph - In the second section, "Documentation should" was "Documentation must" in the 2005 document. Is there a reason that this is now a should? This is a requirement for sample analysis performed by laboratories in the laboratory certification program. Otherwise can the data be found to be valid if brought into question? Note: There are other "musts" statements in the document.	"Must" can only be used when there is a specific requirement in the regulations that can be referenced, otherwise "should" is used.

7	2	10.1		2nd Paragraph - The third sentence still references "field logbook". This terminology was otherwise removed from this section, as compared to the 2005 document. This should be updated accordingly to either field notes or field logs.	Agreed to change
8	2	10.1		3rd Paragraph - The first hyperlink leads to a document that specifies: "This PDF has been moved." and provides another link to click on. The hyperlink should be update to the new web address.	Link updated
9	2	10.1		List of guidance manuals - Just FYI, if the "Low Flow Purging and Sampling Guidance" document is revised in the future, the OQA does have a calibration template that better reflects the requirements of the laboratory certification program and methods. The current example log could use update.	Agreed to update the links if changed
10	2	10	1	Consider changing Bullet 4 - Chain of Custody logs (including forms specific to media, e.g., vapor intrusion chain of custody)	Agreed to change
11	2	10	1	Bullet 5 - Sample analysis request forms. This seems to refer to a form that a non-NJDEP firm would not necessarily use. Consider deleting.	Agreed to change
12	2	10	1	Everywhere "on the Internet" is used - consider deleting. The presence of an internet address makes this redundant.	Agreed to change
13	2	10	2	There is reference to electronic field books but there is no discussion of requirements anywhere. For example, how do you track changes in electronic format? How do you store electronic notes? How to secure these files - word processing files, archival pdf, locked pdf, jpg?	Changed the section to address electronic field notes, notes are taken prior to the field sheets which are required to be submitted in PDF format. We are not be as prescriptive for non submitted notes
14	3	10	2	Consider adding language regarding methods for striking errors (single line through, initial and date)	Changed the section to address electronic field notes, notes are taken prior to the field sheets which are required to be submitted in PDF format. We are not be as prescriptive for non submitted notes
15	3	10	2	Consider adding language that field notes should be factual and objective	Added
16	3	10	2	Consider referring to a non-NJDEP guidance that provides more details regarding best practices for field notes (EPA, USACOE).	Added EPA link
17	3	10	2	Bullet 9 - consider changing parenthetical to read: (including north arrow, orienting features, and reference distances)	Added
18	3	10	2	Consider adding to bullet list - QA/QC sample locations (e.g.,blind duplicate sample location information)	Added
19	3	10	2	Add parenthetical to the last bullet that says (including any changes throughout the day)	Agreed to change

20	3	10	2	Consider adding a paragraph that discusses the methodology for correcting field notes (e.g., corrections to field notes should be made by putting one line through the incorrect statement, and initialing and dating the information to the side of the correction).	Changed the section to address field notes, notes are taken prior to the field sheets which are required to be submitted in PDF format. We are not be as prescriptive for non submitted notes . Links are provided for guidance documents and examples for field documentation
21	2	10.2		1st Paragraph - In the third sentence, "sampling procedures should" was a "sampling procedures must" in the 2005 document. Is there a reason that this is now a should? This should be a must. Note: There are other "musts" statements in the document.	"Must" can only be used when there is a specific requirement in the regulations that can be referenced, otherwise "should" is used.
22	3	10.2		For the field logs bullet requiring inclusion of "All available information on site," if processes or products are confidential, should this information still be included in the logbook?	Yes, because field notes are not required to be submitted however field logs are
23	3	10.2		For the field logs bullet requiring "Preservation," could you please elaborate on the requirements for this?	It is elaborated in chapter 2
24	3	10.2		Including "All available information on site (processes or products, waste generation, nature of spilled material)" in a field log will generate unnecessary repetition and take time/focus off of the task at hand; this information should be in the health & safety plan and is typically captured in the tailgate/toolbox meeting for the day. Also, these documents will be filed together in the project records.	If the information is in the health and safety plan that should be made available if requested and can be noted in the field notes as such
25	3	10.2		Including "Composition and concentration of substance, if known; description of sampling plan" in a field log will generate unnecessary repetition and take time/focus off of the task at hand; this information should be on-site in a workplan/field sampling plan. Also, these documents will be filed together in the project records.	If the information is in the health and safety, QAPP, or SAP that should be made available if requested and can be noted in the field notes as such
26	3	10.2		Including "Sketch showing the sample location (including reference distances)" in a field log will generate unnecessary repetition and take time/focus off of the task at hand; this information should be on-site in a workplan/field sampling plan/sample location figure. Also, these documents will be filed together in the project records. Of course, when taking samples from a newly established sampling point, a field sketch would be expected, and there would be subsequent surveying conducted to place the location on a sample location figure. Routine groundwater sampling for established groundwater monitoring wells should not require a sketch in the log book	A sketch should be included in the field notes for reference
27	3	10.2		Including "Geographically referenced location of sample point and how determined..." in a field log will generate unnecessary repetition and take time/focus off of the task at hand; for established points, this information should be on-site in a workplan/field sampling plan. Also, these documents will be filed together in the project records. Of course, for newly established sampling points, this would be expected if using a GPS in the field, but may not be available if the point survey is scheduled for a later date.	Referenced location of sampling points should be included in the field notes

28	3	10.2		Including "Preservation" in a field log will generate unnecessary repetition and take time/focus off of the task at hand; this information should be on the chain-of-custody. Also, these documents will be filed together in the project records.	Preservation information should be included in the field notes
29	3	10.2		"Field instrument calibration information" is often provided on a separate, dedicated calibration log. CCNJ/SRIN recommend that the DEP add "(unless provided elsewhere on a calibration log sheet)".	Changed
30	3	10.2		Seventh bullet. Suggest deleting the term "All". This is unrealistic for field notes. Is the practitioner required to present the entire site history and analytical data collected to date? Bullets 7 and 8 can be addressed by indicating in the log notes that the pertinent information is included in the work plan, dated ----.	Removed bullet
31	3	10.2		Penultimate bullet. Sample description. No bullets have been provided of what the typical items noted should be. At a minimum the appropriate guidance document of FSPM chapter referencing things like soil texture, color, saturation, organic material, evidence of fill, sheen, odor, etc. should be referenced. Same for surface water, groundwater, sediment and other media.	Changed
32	3	10.2		Last bullet "forty-eight hours previous" is too prescriptive and may not even be relevant. What if there was a hurricane 56 hours earlier, or a week before? Suggest changing to "Weather conditions during the day of sampling and recent conditions, if applicable that may influenced sampling or analytical results (e.g. precipitation events, drought, flooding, snow depth)."	Changed
33	3	10.2		"Exact" location is unrealistic. Any form of measurement, whether surveying equipment, GPS, or measuring with a tape from the nearest building will have its own margin of error. Suggest specifying here the standard of accuracy desired (e.g. within 1 foot accuracy), recognizing the limits of current technology in use, such as GPS systems on tablets.	Took out exact and referenced NJAC
34	3	10.2		It is suggested that the bullet point "....any factors that may affect its quality" include a reference to a list of what those considerations might be. That way investigators know what main factors they should document.	Changed to make more clear
35	3	10.3		GPS used without first defining the acronym.	Agreed to change
36	4	10.3		Last bullet. This is a QA/QC document and as such should suggest a means of verifying the accuracy of the GPS or other measurement system used. For example, finding the nearest USGS benchmarks and measuring the location with a GPS would be a good way to verify accuracy. Or other fixed structures could be used (e.g. Groundwater wells previously surveyed).	Added additional information

37	4	10.4		Photo documentation. This section says nothing regarding the quality of the photo. Photo documentation does little if the only photo present shows a piece of ground with no indication of where it is. Good photo documentation includes: 1) a photo of the general location, indicating direction and distance away, 2) a close up of the sample or boring indicating its characteristics, 3) photos of any important characteristics noted (e.g. presence of product), 4) not necessary at every location, but some photos showing individuals sampling for the legal record that the investigators were there on that day in that location at that time.	Added additional information
38	4	10.4		Photo documentation can include a GPS location associated with each image. GPS (if available) could be included in the bullet point list.	Added additional information
39	4	10.4		Addition: Multiple photographs should be taken at different perspectives ensuring location can be established in addition to proper sampling techniques	Added additional information
40	4	10.4		1st Paragraph - The fourth sentence would read better if it was updated to: "To appropriately document the locations and facilitate relocation of the sampling points, at least two reference points should be photographed."	Changed
41	4	10.4		1st Paragraph - The first sentence on the page (5th sentence in the paragraph) would read better if it was updated to: "Proper photographic record maintenance is crucial to validly represent an existing situation."	Agreed that the change was not needed
42	4	10.4		2nd Paragraph - The last two sentences in the paragraph would read better if updated to: "Video coverage of a sampling event can be equally or even more valuable than photographs because it can be used not only to identify the location at which samples were collected, but also to prove that samples were collected and handled properly. Additionally, video coverage can be used as a record of site conditions..."	Agreed to change
43	4	10.5	1	2nd Paragraph - Add the word "the" to the first sentence: "When naming sample locations, it is important to keep the naming convention consistent..."	Agreed to change
44	4	10.5	1	Please elaborate on the meaning/definition of "Sample Matrix"	Changed
45	4	10.5	1	Sample labels. This isn't something to legislate, and is more about numbering than labels per se, but is intended as a helpful hint. If you want to produce figures and tables of analytical results that are easy to follow and interpret it is very helpful to try to sequence the samples in an appropriate order. For example, if sampling a grid numbering them along a row is a good way to keep track of and report information, as opposed to teams randomly sampling within that grid to produce a map that goes from A3 to C27 to D1, rather than A1, A2, A3 running across the top row.	Agreed that we already suggested having the sample locations be consistent and did not add additional information

46	4	10.5	1	This section calls for the samples to be pre-labeled and the label then covered with tape to protect it. The details of the label include time of sample, which would not be determined until actually in the field. Time should not be included in the pre-labeling and then covered with tape, as it may lead to inaccurate accounting of the sampling event.	Changed
47	4	10.5	1	Some containers are weighed prior to leaving the laboratory. Consider whether this direction to add tape could affect sample bottle weight.	Tape is not required but is was agreed that the tape would not affect the sample weight
48	4	10.5	1	While it is good advice to pre-print labels, all the information listed in the first paragraph may result in the need to make corrections on the pre-printed forms. For example, we don't know the time of sample collection ahead of actually collecting the time - advise the reader that if pre-printing, some field are best left blank.	Changed
49	4	10.5	1	Naming conventions should take into consideration environmental data deliverable/environmental database requirements prior to selecting a naming protocol (in other words, take into consideration the number of alphanumeric digits, etc. prior to mobilizing to the field).	Should be discussed in the QAPP
50	4	10.5	1	there is no chain of custody following.	The COC is located in the document
51	5	10.5	1	The procedure is missing some of the details that are typically used - such as crossing out blank lines at the end of the COC, using a 24:00 clock, what preservative were added, etc. etc.	Added
52	4	10.5	2	Addition: The information on the COC should be the same as the information presented on the sample labels unless otherwise noted.	Added
53	4	10.5	2	1st Paragraph - Recommend adding the following to the second sentence: "The COC should remain with the sample(s) and bear the name of the person assuming responsibility for the sample(s).	Agreed to change
54	4	10.5	2	2nd Paragraph - The third sentence would read better if it was updated to: " The COC should act as a confirmation of information provided to the laboratory prior to the initiation of the sample event. "	Agreed to change
55	4	10.5	2	Perhaps it is elsewhere in guidance documents, but this section should really be beefed up to stress the definition of "custody". Custody is broken if the samples are not in the site of the investigator, or are under lock and key held only by the investigator. Part of the reason the O.J. Simpson case had the outcome it did was because full chain of custody could not be documented, that is, custody was potentially broken because the samples/evidence were potentially accessible to be altered. Any time the samples change hands, they have to be signed for on the custody form along with the date and time. The text should state that explicitly here and/or refer to other guidance that spells that out.	Added additional information
56	4	10.5	2	Sample preservative can be added to the following sentence; "Information may include identification of samples by number, location and time collected and desired analysis".	Added

57	4	10.5	2	An alternate form may be used if one is available directly from the laboratory that will be doing the analysis. For example, NJDOH PHEL form RAD-4 - Radioanalytical Services Sample Submittal available at the link below. http://healthapps.state.nj.us/forms/subforms.aspx?pro=phel&_gl=1*zc3x90*_ga*MjkwMzg0MTYzLjE2MzE3MDkxNjc.*_ga_5PWJJG6642*MTY5NDEwMDgyOS40NC4xLjE2OTQxMDA4OTUuMC4wLjA .	Added
58	5	COC Example	-	At the top of the form it identifies: "With Shipping Container". Why maintain this designation when the chapter no longer differentiates between forms with and without a shipping container?	Removed "with shipping container"
59	6			The Chain of Custody form is NJDEP's own form and it is not the same as what most labs use - this should be stated on the example form	Added language to address