

When to Sample Soils

The generator is responsible to determine whether excavated soils can be considered unregulated clean fill materials, or should be tested to determine whether contaminants are present. The following are items which a generator of excavated soils requiring disposal at another location should consider prior to determining whether sampling should be performed. While judgment must be used to determine whether soils should be sampled, only one factor supporting soil sampling is necessary for soil sampling prior to excavation to be a reasonable decision. It is understood that many properties may not have a Phase I or Phase II Environmental Site Assessment (ESA) that has been performed prior to excavation.

Factors during planning stages that would support not sampling the soils because they are unlikely to contain contaminants of concern

- A Phase I ESA indicates that there are no Recognized Environmental Conditions (RECs) at the property
- The present and past land uses (such as residential, open space, or agricultural) suggest that a release to the environment is unlikely to have occurred on the property
- A Phase II ESA of the site indicates that no contaminants have been identified in the area of excavation
- A review of the Bureau for Remediation and Redevelopment Tracking System (BRRTS) web site does not indicate that the property or adjacent properties is a site with RECs

Observations prior to excavation that would support sampling soils because they may contain contaminants of concern

- The converse of the items above
- Potential contaminant sources such as USTs, associated piping and dispensers, ASTs, drums on site or adjacent to the site
- The site or adjacent properties with potential land uses to release hazardous substances such as gas stations, automobile repair facilities, dry cleaners, foundries, salvage yards, bulk chemical plants, agricultural chemical facilities, landfills
- The site or adjacent properties have signs of ongoing remedial investigation or action including soil boreholes, monitoring wells, former excavations, stockpiled soils
- The site or adjacent properties has suspicious fill areas
- The site or adjacent properties has stained soils or stressed vegetation
- The site or adjacent properties has railroad ties and other creosote treated timbers

Field Observations during excavation that would affect/change a decision to not sample soils

- Stained soils- soils should be sampled
- Hydrocarbon or solvent odors- soils should be sampled
- Presence of waste materials such as cinders, foundry sand, fly ash- soils should be sampled
- Presence of other waste materials such as garbage- soils/wastes would not require sampling, but would require disposal at a solid waste landfill (unless a written exemption was received from the DNR)

- Presence of “clean” fill (concrete, bricks, asphalt, soil fill or unpainted wood) can be disposed of as clean fill and does not need to be sampled