

	Petroleum Restoration Program Guidance Guidance for Cumulative Historic Data Compilation	<u>Author:</u> Charles Williams and Blake Miller
		<u>Updated:</u> 08/26/2021

To determine cleanup and closure decisions, accurate and comprehensive cumulative analytical data is required. In order to compile historic data that was collected prior to work under an ATC, the following guidance shall be effective on a point forward basis.

The PRP has determined that all available historic data for petroleum contaminated sites should be compiled into comprehensive updated tables (regardless of the prior format) and included in all reports where cumulative data is required. Where historic data precedes a contractual site assignment under the ATC and comprehensive electronic tables are not available, additional personnel hours to compile historic data shall be allowed as follows:

An allowance of up to 4 hours of personnel time at contract rates (2 at the Scientist/Technical Specialist rate and 2 at the Administrative rate) shall be allowed, if requested, for the compilation of all historic data into cumulative analytical summary tables utilizing the standardized [Soil and Groundwater Analytical Tables](#) located on the [PRP Assessment Guidance](#) webpage. This may be allowed once per site for sites that have data preceding the ATC contractual site assignment that cannot be obtained in electronic format after due diligence has been conducted. Tables should include numerical values for all samples with the appropriate number of significant figures and all lab data qualifiers listed.

If a constituent was not detected, reporting these values as non-detect (ND), below detection limit (BDL) or similar is allowed for historical data except for the two most recent sampling events for a monitoring well/soil sample indicating the constituent is clean. For the two most recent sampling events if a constituent was ND/BDL, the method detection limit with the appropriate qualifier should be reported. Data collected on or after 2014 is not considered historical. All samples of constituents with documented exceedances must be entered in the tables.

The comprehensive tables should be included in the report submittal as well as provided in raw electronic format (Microsoft Excel). The additional hours should be included in the first task containing field / sampling activities to provide a detailed view of the historical results to aid in decisions for subsequent activities. Tables and field notes/office logs documenting the hours utilized must be submitted with the task deliverable.

Site managers shall review the tables submittal for completeness and accuracy prior to approving costs for historic data table generation.

Irrespective of whether or not the historic data compilation allowance is allowed, a comprehensive final report, such as a General Site Assessment Report, that is included in a purchase order (PO) should not subsequently be removed from the PO on the basis that an interim report now includes all required data for decisions or closure because the final report is an integral part of the compensation provided for contractual services.