

SOAH DOCKET NO. 582-15-2082
TCEQ DOCKET NO. 2015-0069-MSW

APPLICATION OF 130 § BEFORE THE STATE OFFICE
ENVIRONMENTAL PARK, LLC § OF
FOR PROPOSED PERMIT NO. § ADMINISTRATIVE HEARINGS
2383 §

**TJFA, L.P. & EPICC’S REPLY TO APPLICANT’S RESPONSE TO
TJFA/EPICC’S MOTION TO STRIKE PORTIONS OF APPLICANT’S
RESPONSE TO CLOSING ARGUMENTS**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES KERRIE JO
QUALTROUGH AND CASEY BELL:

COME NOW Protestants TJFA, L.P. and Environmental Protection in the Interest
of Caldwell County (collectively, “Protestants”) and file this Reply to Applicant’s
Response to TJFA/EPICC’s Motion to Strike Portions of Applicant’s Response to
Closing Arguments.

I. PENDING MOTIONS

- TJFA/EPICC’s Motion to Strike Portions of Applicant’s Response to Closing Arguments: This motion requests the ALJs to strike various sections of Applicant’s Response to Closing Arguments. This motion was filed on December 22, 2016 and Applicant’s response was filed on December 27, 2016. By this filing, TJFA and EPICC are providing their reply to Applicant’s response to the motion.
- TIFA/EPICC’S Motion to Re-Open the Record to Admit Protestants’ Exhibit P-47 & P-48: This motion requests that the ALJs admit into evidence Protestants’ Exhibit P-47 (a letter from the TCEQ Executive Director returning the permit application for the Pintail Landfill in Waller County) and Exhibit P-48 (a copy of the TCEQ registration

for the Pintail Landfill Transfer Station in Waller County). This motion was filed and served after 5:00 pm on December 22, 2016 and is deemed filed and served on December 23, 2016. Applicant filed its response to this motion on December 28, 2016. A reply is due January 5.¹

II. ARGUMENT

In response to Protestants' motion to strike, Applicant makes several arguments, including, (1) the motion was not timely; (2) there is no legal basis or standard for the motion to strike; and (3) Protestants referred to an ASTM standard without offering it into evidence, so Applicant should be allowed to do the same. Each of these arguments is erroneous. They are addressed, in turn, below.

First, Applicant agreed to December 22 as the deadline to submit replies to responses to closing arguments. The motion to strike was filed by that deadline, and it serves as a form of reply to Applicant's response to closing arguments. There is no other applicable deadline that would apply here, and Applicant cites to nothing in support of its argument that the motion to strike was untimely.

Next, Applicant argues that Protestants have not identified any legal basis or standard in support of their request to strike portions of Applicant's response to closing arguments. Protestants' motion to strike requested that the ALJs strike those portions of the Applicant's response to closing arguments that are outside the evidentiary record or are not supported by the evidentiary record. That the parties' closing arguments should be

¹ Because SOAH was closed on January 2, in observance of New Year's Day, Protestants have not included January 2 in their calculation of the deadline for filing a reply brief.

limited to the evidence presented is axiomatic. The arguments are intended to assist the ALJs in the weighing of evidence presented, so that they may prepare findings of fact, in accordance with the Administrative Procedure Act. Section 2001.141 of the APA states that findings of fact may be based only on evidence presented and on matters that are officially noticed. Tex. Gov't Code § 2001.141. Thus, references to facts outside the evidentiary record are not proper, because findings of fact (and thus, the proposal for decision) cannot be based on such information.

Moreover, TCEQ Rule 80.115 states that all parties have the right to cross-examine witnesses; parties also have the right to object to evidence. *See* Tex. Gov't Code § 2001.084; 30 Tex. Admin. Code §§ 80.115, 80.127(a), & 80.129. By relying on facts outside the record, Applicant has deprived, or at least impeded, Protestants' rights to object and cross-examine regarding this new information. For instance, had Applicant timely offered into evidence the TxDOT hydraulic design manual, and had it been admitted, Protestants would have cross-examined Applicant's experts regarding their use and reliance on this manual. Similarly, had Applicant sought to elicit testimony regarding TDS Landfill operations, Protestants would have objected to the testimony.

Finally, Applicant argues that because Protestants referred to an ASTM standard as a demonstrative exhibit, Applicant should be allowed to do the same. This argument is simply a non sequitur.

Protestants offered an ASTM standard in response to Applicant's latest (and belated) argument that Mr. Snyder simply used a different nomenclature to describe the same geologic features observed by Mr. Rubinov. Testimony related to this argument was

presented on the last day of the evidentiary hearing, when Mr. Snyder provided rebuttal testimony regarding his observation of the soil sample presented by Protestants' witness.²

As an initial matter, under TCEQ Rule 80.117(b), Protestants could have sought to offer additional evidence and expert testimony to rebut Mr. Snyder's last-minute testimony regarding his preferred nomenclature to describe certain geologic features. 30 Tex. Admin. Code § 80.117(b) ("Any party may present a rebuttal case when another party presents evidence that could not have been reasonably anticipated."). But rather than delay the process by offering more expert testimony to refute Mr. Snyder's latest theory, Protestants instead referred to an ASTM standard³ to demonstrate that Mr. Snyder has no reliable basis for his theory that the terms "fissures" and "blocky" were interchangeable. Protestants also cited to a TCEQ rule in support of this same argument. 30 Tex. Admin. Code § 330.63(e)(4). In short, the reference to the ASTM standard was not offered as evidence to prove a fact. It was provided as an example, to attempt to demonstrate a negative: that Mr. Snyder had no basis for his theory that the terms "blocky" and "fissure" are interchangeable, and his opinion testimony on this issue remains unreliable. Thus, it makes sense that this ASTM standard need not be offered into evidence.

Evidence regarding the reliability of ASTM standards, and regarding their use by professionals in the field of geology, has already been presented by Protestants' experts. Moreover, ASTM standards are referenced in TCEQ rules. *See, e.g.*, 30 Tex. Admin.

² Tr. V. 10, p. 2079:3-6.

³ This ASTM standard is attached to this reply brief for the convenience of the ALJs.

Code § 330.63. Thus, sufficient evidence exists for the ALJs to determine the weight to be afforded the ASTM standards for purposes of determining the reliability of Mr. Snyder's latest theory.

Finally, Applicant is not prejudiced by the reference to the ASTM standard. These ASTM standards should already be known to Applicant's experts and should not constitute surprise evidence.

Responses to more specific arguments made by Applicant are addressed below.

1. Regarding references to Exhibit 130EP-23, Applicant complains that Protestants "have not identified the specific portion or portions of [Applicant's] Response to Closing Arguments they seek to have stricken." This is simply inaccurate.

Protestants' motion to strike clearly requests that footnote 22, on page 22, of Applicant's Response Brief should be stricken, as well as any reference to Exhibit 130EP-23. This provides sufficient notice of the portions of Applicant's response to closing arguments that Protestants' seek to have stricken.

Next, Applicant argues that because Protestants referred to an ASTM standard as demonstrative evidence, Protestants have no right to complain about reference to an exhibit that the ALJs refused to admit into evidence. Protestants have addressed this argument above. In addition, Protestants maintain that this exhibit, Exhibit 130EP-23, was offered into evidence by Applicant during the hearing, and the ALJs determined that it should not be admitted. By continuing to rely on the exhibit, Applicant is brazenly flouting the ALJs' ruling.

Moreover, Applicant is clearly attempting to prove a fact—*i.e.*, that TCEQ staff regularly allows the drilling of borings before a plan is approved and thus, Snyder need not have awaited approval before moving forward with Applicant’s borings—by relying on this exhibit that was deemed inadmissible. Indeed, this is a desperate attempt to justify Snyder’s disregard for TCEQ rules, but the ALJs correctly excluded this exhibit. Protestants, on the other hand, were not attempting to prove any particular fact by referring to the ASTM standard, other than to demonstrate that Snyder offered no basis for his theory on rebuttal that certain geological terms were interchangeable.

Finally, Exhibit 130EP-23 violates SOAH Rule 155.419. That rule states that a “party relying on a specific, written agency policy not incorporated in a rule has the burden of authenticating the policy and showing it to be applicable to a factual or legal issue in the case.” 1 Tex. Admin. Code § 155.419. This standard is particularly relevant and necessary where, as here, Applicant is attempting to prove that staff employs a policy that directly contradicts the plain language in TCEQ’s own rules.

2. Applicant’s only justification for referring to Attachment 1 without offering it into evidence is that Protestants did the same thing by referring to an ASTM standard that they did not offer into evidence. Applicant argues that Attachment 1 “is not relied on to prove any element of its case, and [Applicant] included and referenced it for demonstrative purposes and as a rebuttal to [Protestants’] argument that

[Applicant's] permit application violates TCEQ and Texas Board of Professional Geoscience rules." There are several errors with this argument.

First, Applicant has the burden of proving that its experts' opinions are reliable. This is a burden that Applicant bears as part of its direct case, and evidence relevant to the reliability of its experts' opinions should not be reserved for sur-rebuttal argument.

Second, Applicant has been well-aware of the issues regarding the reliability of its experts' opinions since before the hearing even commenced. Snyder, in particular, was served with a "preservation of evidence" letter, shortly after the landfill permit application was filed with TCEQ. During the pre-hearing process, Protestants filed motions regarding spoliation of evidence and motions seeking exclusion of evidence, challenging the reliability of Applicant's experts' opinions based, in part, on their failure to comply with applicable professional and legal standards. So, this is not an instance where the Applicant can claim that "another party present[ed] evidence that could not have been reasonably anticipated." *See* Tex. Admin. Code § 80.117(b).

Finally, unlike Protestants, Applicant had an opportunity, and took advantage of that opportunity, to present a rebuttal case. More specifically, Applicant presented rebuttal testimony by Snyder. And, as explained above, Applicant was well-aware of the issues associated with the reliability of Snyder's opinions and testimony, at that time. Yet, Applicant chose to elicit a very narrow scope of testimony from Snyder on rebuttal.

In sum, Applicant's argument that it should be allowed to refer to a document not offered into evidence because Protestants did the same thing does not work here. Its attempt to rely on documents that have not been offered into evidence should be rejected. Similarly, any belated request to offer Attachment 1 into evidence should also be rejected as it fails to rebut any unanticipated or surprise evidence offered by Protestants (who did not even present a rebuttal case).

3. Here, again, Applicant argues that it should be allowed to refer to the TxDOT hydraulic design manual because Protestants referred to an ASTM standard without offering it into evidence. For the reasons described above, that argument fails here. In short, Applicant bears the burden of proof, including the burden to prove the reliability of its experts' opinions. Any evidence necessary to satisfy that burden should have been offered by Applicant during the hearing, not as sur-rebuttal argument. And finally, Applicant was well-aware of Mr. Bratton's opinion regarding Traw's failure to use the appropriate "Manning's n" early on in this case. Applicant was not surprised by this argument.
4. Finally, Applicant argues that references to TDS, Bob Gregory, and the TDS landfill permit should not be stricken because (1) Protestants did not identify which portions of the response to closing arguments they seek to have stricken; (2) Protestants referred to an ASTM standard that was not offered into evidence, so Applicant should likewise be permitted to refer to facts that are not supported by evidence; (3) these unsupported statements are offered as a form of rebuttal; and (4) Protestants have repeatedly referred to Green Group Holdings and Pintail

Landfill, via evidence and arguments, throughout these proceedings, so they should not be allowed to complain about references to TDS and Mr. Gregory now.

First, in their motion to strike, Protestants identified pages 71, 75, and 87 as the portions of the brief that should be stricken because they referred to TDS, Mr. Gregory, or the TDS landfill permit. This should have provided Applicant with sufficient notice of the objectionable portions of its brief.

Second, as explained above, the fact that Protestants referred to an ASTM standard in response to Snyder's rebuttal testimony does not justify Applicant's references to TDS and/or Mr. Gregory, which are based on no evidence in the record, and are simply not relevant. These are bald assertions, which are offered, in response to closing arguments, for the truth of the matter. Yet, Applicant did not even attempt to offer any evidence in support of these assertions, and has made no attempt to explain the relevance or reliability of the statements.

Third, these unsupported and irrelevant statements cannot be considered proper rebuttal. Applicant bore the burden of proof in this proceeding. Applicant was well-aware of the issues raised by Protestants, including issues regarding land use compatibility, operating hours, and waste acceptance rates. Moreover, Applicant presented a rebuttal case; Protestants did not. So, Applicant had the opportunity to present any rebuttal evidence it deemed relevant during the rebuttal phase of the hearing. Applicant cannot now claim that it could not have reasonably anticipated evidence or arguments raised by Protestants regarding land use compatibility, operating hours, or waste acceptance rates.

Finally, neither TDS nor Mr. Gregory is a party to this proceeding. Neither is seeking a landfill permit or permit amendment via this proceeding. Neither bears any burden of proof in this proceeding. By contrast, Applicant bears the burden of proof regarding every issue raised in this proceeding, including issues regarding competency, corporate ownership, and solid waste permitting history. Therefore, there is nothing unusual about presenting evidence (which Applicant, for the most part, did not object to) and arguments regarding Applicant's affiliated corporations.

In short, Applicant offers no legal argument or basis for including statements regarding TDS and Mr. Gregory in its closing argument—statements that are unsupported by the record and that are irrelevant to this case.

PRAYER

For the reasons stated above, Protestants respectfully request that the ALJs strike the various portions of Applicant's Response to Closing Arguments that are identified in TJFA/EPICC's Motion to Strike. Protestants further request any other relief they may be entitled to.

Respectfully submitted,



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CERTIFICATE OF SERVICE

By my signature, below, I hereby certify that a true and correct copy of the foregoing document has been served on the following attorneys of record by electronic mail, facsimile, or US Mail on this 4th day of January, 2017.



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Attachment A



Standard Practice for Description and Identification of Soils (Visual-Manual Procedure)¹

This standard is issued under the fixed designation D2488; the number immediately following the designation indicates the year of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the year of last reappraisal. A superscript epsilon (ϵ) indicates an editorial change since the last revision or reappraisal.

This standard has been approved for use by agencies of the U.S. Department of Defense.

1. Scope*

1.1 This practice covers procedures for the description of soils for engineering purposes.

1.2 This practice also describes a procedure for identifying soils, at the option of the user, based on the classification system described in Test Method D2487. The identification is based on visual examination and manual tests. It must be clearly stated in reporting an identification that it is based on visual-manual procedures.

1.2.1 When precise classification of soils for engineering purposes is required, the procedures prescribed in Test Method D2487 shall be used.

1.2.2 In this practice, the identification portion assigning a group symbol and name is limited to soil particles smaller than 3 in. (75 mm).

1.2.3 The identification portion of this practice is limited to naturally occurring soils (either intact or disturbed).

NOTE 1—This practice may be used as a descriptive system applied to such materials as shale, claystone, shells, crushed rock, etc. (see Appendix X2).

1.3 The descriptive information in this practice may be used with other soil classification systems or for materials other than naturally occurring soils.

1.4 The values stated in inch-pound units are to be regarded as standard. The values given in parentheses are mathematical conversions to SI units that are provided for information only and are not considered standard.

1.5 *This standard does not purport to address all of the safety problems, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.* For specific precautionary statements see Section 8.

¹ This practice is under the jurisdiction of ASTM Committee D18 on Soil and Rock and is the direct responsibility of Subcommittee D18.07 on Identification and Classification of Soils.

Current edition approved June 15, 2009. Published July 2009. Originally approved in 1966. Last previous edition approved in 2009 as D2488 – 09. DOI: 10.1520/D2488-09A.

1.6 *This practice offers a set of instructions for performing one or more specific operations. This document cannot replace education or experience and should be used in conjunction with professional judgment. Not all aspects of this practice may be applicable in all circumstances. This ASTM standard is not intended to represent or replace the standard of care by which the adequacy of a given professional service must be judged, nor should this document be applied without consideration of a project's many unique aspects. The word "Standard" in the title of this document means only that the document has been approved through the ASTM consensus process.*

2. Referenced Documents

2.1 ASTM Standards:²

- D653 Terminology Relating to Soil, Rock, and Contained Fluids
- D1452 Practice for Soil Exploration and Sampling by Auger Borings
- D1586 Test Method for Penetration Test (SPT) and Split-Barrel Sampling of Soils
- D1587 Practice for Thin-Walled Tube Sampling of Soils for Geotechnical Purposes
- D2113 Practice for Rock Core Drilling and Sampling of Rock for Site Investigation
- D2487 Practice for Classification of Soils for Engineering Purposes (Unified Soil Classification System)
- D3740 Practice for Minimum Requirements for Agencies Engaged in Testing and/or Inspection of Soil and Rock as Used in Engineering Design and Construction
- D4083 Practice for Description of Frozen Soils (Visual-Manual Procedure)

3. Terminology

3.1 Definitions:

3.1.1 Except as listed below, all definitions are in accordance with Terminology D653.

² For referenced ASTM standards, visit the ASTM website, www.astm.org, or contact ASTM Customer Service at service@astm.org. For *Annual Book of ASTM Standards* volume information, refer to the standard's Document Summary page on the ASTM website.

*A Summary of Changes section appears at the end of this standard

NOTE 2—For particles retained on a 3-in. (75-mm) US standard sieve, the following definitions are suggested:

Cobbles—particles of rock that will pass a 12-in. (300-mm) square opening and be retained on a 3-in. (75-mm) sieve, and

Boulders—particles of rock that will not pass a 12-in. (300-mm) square opening.

3.1.2 *clay*—soil passing a No. 200 (75- μ m) sieve that can be made to exhibit plasticity (putty-like properties) within a range of water contents, and that exhibits considerable strength when air-dry. For classification, a clay is a fine-grained soil, or the fine-grained portion of a soil, with a plasticity index equal to or greater than 4, and the plot of plasticity index versus liquid limit falls on or above the “A” line (see Fig. 3 of Test Method D2487).

3.1.3 *gravel*—particles of rock that will pass a 3-in. (75-mm) sieve and be retained on a No. 4 (4.75-mm) sieve with the following subdivisions:

coarse—passes a 3-in. (75-mm) sieve and is retained on a $\frac{3}{4}$ -in. (19-mm) sieve.

fine—passes a $\frac{3}{4}$ -in. (19-mm) sieve and is retained on a No. 4 (4.75-mm) sieve.

3.1.4 *organic clay*—a clay with sufficient organic content to influence the soil properties. For classification, an organic clay is a soil that would be classified as a clay, except that its liquid limit value after oven drying is less than 75 % of its liquid limit value before oven drying.

3.1.5 *organic silt*—a silt with sufficient organic content to influence the soil properties. For classification, an organic silt is a soil that would be classified as a silt except that its liquid limit value after oven drying is less than 75 % of its liquid limit value before oven drying.

3.1.6 *peat*—a soil composed primarily of vegetable tissue in various stages of decomposition usually with an organic odor, a dark brown to black color, a spongy consistency, and a texture ranging from fibrous to amorphous.

3.1.7 *sand*—particles of rock that will pass a No. 4 (4.75-mm) sieve and be retained on a No. 200 (75- μ m) sieve with the following subdivisions:

coarse—passes a No. 4 (4.75-mm) sieve and is retained on a No. 10 (2.00-mm) sieve.

medium—passes a No. 10 (2.00-mm) sieve and is retained on a No. 40 (425- μ m) sieve.

fine—passes a No. 40 (425- μ m) sieve and is retained on a No. 200 (75- μ m) sieve.

3.1.8 *silt*—soil passing a No. 200 (75- μ m) sieve that is nonplastic or very slightly plastic and that exhibits little or no strength when air dry. For classification, a silt is a fine-grained soil, or the fine-grained portion of a soil, with a plasticity index less than 4, or the plot of plasticity index versus liquid limit falls below the “A” line (see Fig. 3 of Test Method D2487).

4. Summary of Practice

4.1 Using visual examination and simple manual tests, this practice gives standardized criteria and procedures for describing and identifying soils.

4.2 The soil can be given an identification by assigning a group symbol(s) and name. The flow charts, Fig. 1a and Fig. 1b for fine-grained soils, and Fig. 2, for coarse-grained soils, can be used to assign the appropriate group symbol(s) and name. If

the soil has properties which do not distinctly place it into a specific group, borderline symbols may be used, see Appendix X3.

NOTE 3—It is suggested that a distinction be made between *dual symbols* and *borderline symbols*.

Dual Symbol—A dual symbol is two symbols separated by a hyphen, for example, GP-GM, SW-SC, CL-ML used to indicate that the soil has been identified as having the properties of a classification in accordance with Test Method D2487 where two symbols are required. Two symbols are required when the soil has between 5 and 12 % fines or when the liquid limit and plasticity index values plot in the CL-ML area of the plasticity chart.

Borderline Symbol—A borderline symbol is two symbols separated by a slash, for example, CL/CH, GM/SM, CL/ML. A borderline symbol should be used to indicate that the soil has been identified as having properties that do not distinctly place the soil into a specific group (see Appendix X3).

5. Significance and Use

5.1 The descriptive information required in this practice can be used to describe a soil to aid in the evaluation of its significant properties for engineering use.

5.2 The descriptive information required in this practice should be used to supplement the classification of a soil as determined by Test Method D2487.

5.3 This practice may be used in identifying soils using the classification group symbols and names as prescribed in Test Method D2487. Since the names and symbols used in this practice to identify the soils are the same as those used in Test Method D2487, it shall be clearly stated in reports and all other appropriate documents, that the classification symbol and name are based on visual-manual procedures.

5.4 This practice is to be used not only for identification of soils in the field, but also in the office, laboratory, or wherever soil samples are inspected and described.

5.5 This practice has particular value in grouping similar soil samples so that only a minimum number of laboratory tests need be run for positive soil classification.

NOTE 4—The ability to describe and identify soils correctly is learned more readily under the guidance of experienced personnel, but it may also be acquired systematically by comparing numerical laboratory test results for typical soils of each type with their visual and manual characteristics.

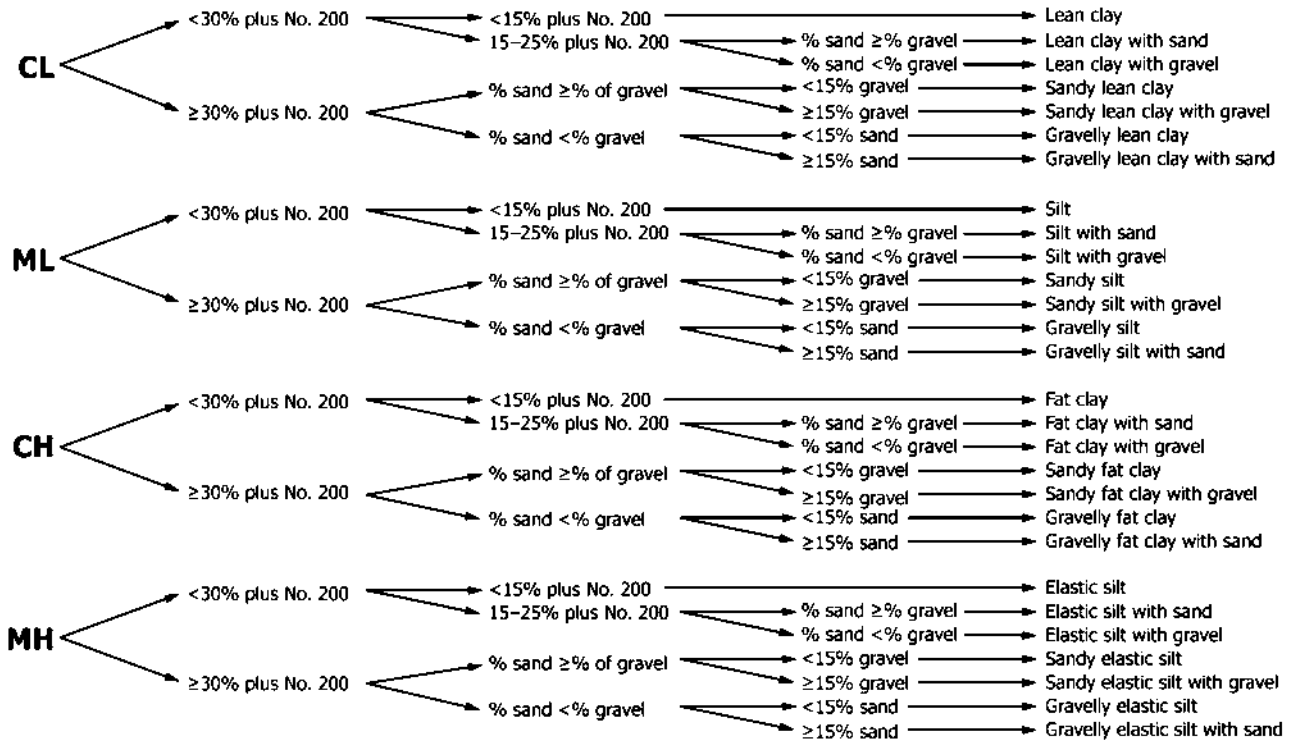
5.6 When describing and identifying soil samples from a given boring, test pit, or group of borings or pits, it is not necessary to follow all of the procedures in this practice for every sample. Soils which appear to be similar can be grouped together; one sample completely described and identified with the others referred to as similar based on performing only a few of the descriptive and identification procedures described in this practice.

5.7 This practice may be used in combination with Practice D4083 when working with frozen soils.

NOTE 5—Notwithstanding the statements on precision and bias contained in this standard: The precision of this test method is dependent on the competence of the personnel performing it and the suitability of the equipment and facilities used. Agencies that meet the criteria of Practice D3740 are generally considered capable of competent and objective testing. Users of this test method are cautioned that compliance with Practice D3740 does not in itself assure reliable testing. Reliable testing

GROUP SYMBOL

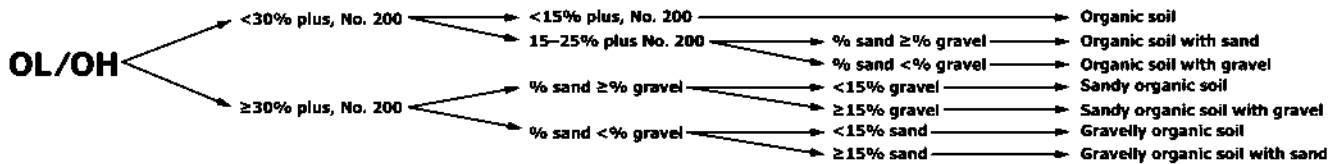
GROUP NAME



NOTE 1—Percentages are based on estimating amounts of fines, sand, and gravel to the nearest 5%.
 FIG. 1a Flow Chart for Identifying Inorganic Fine-Grained Soil (50 % or more fines)

GROUP SYMBOL

GROUP NAME



NOTE 1—Percentages are based on estimating amounts of fines, sand, and gravel to the nearest 5%.

FIG. 1 b Flow Chart for Identifying Organic Fine-Grained Soil (50 % or more fines)

depends on several factors; Practice D3740 provides a means for evaluating some of those factors.

6. Apparatus

6.1 *Required Apparatus:*

6.1.1 *Pocket Knife or Small Spatula.*

6.2 *Useful Auxiliary Apparatus:*

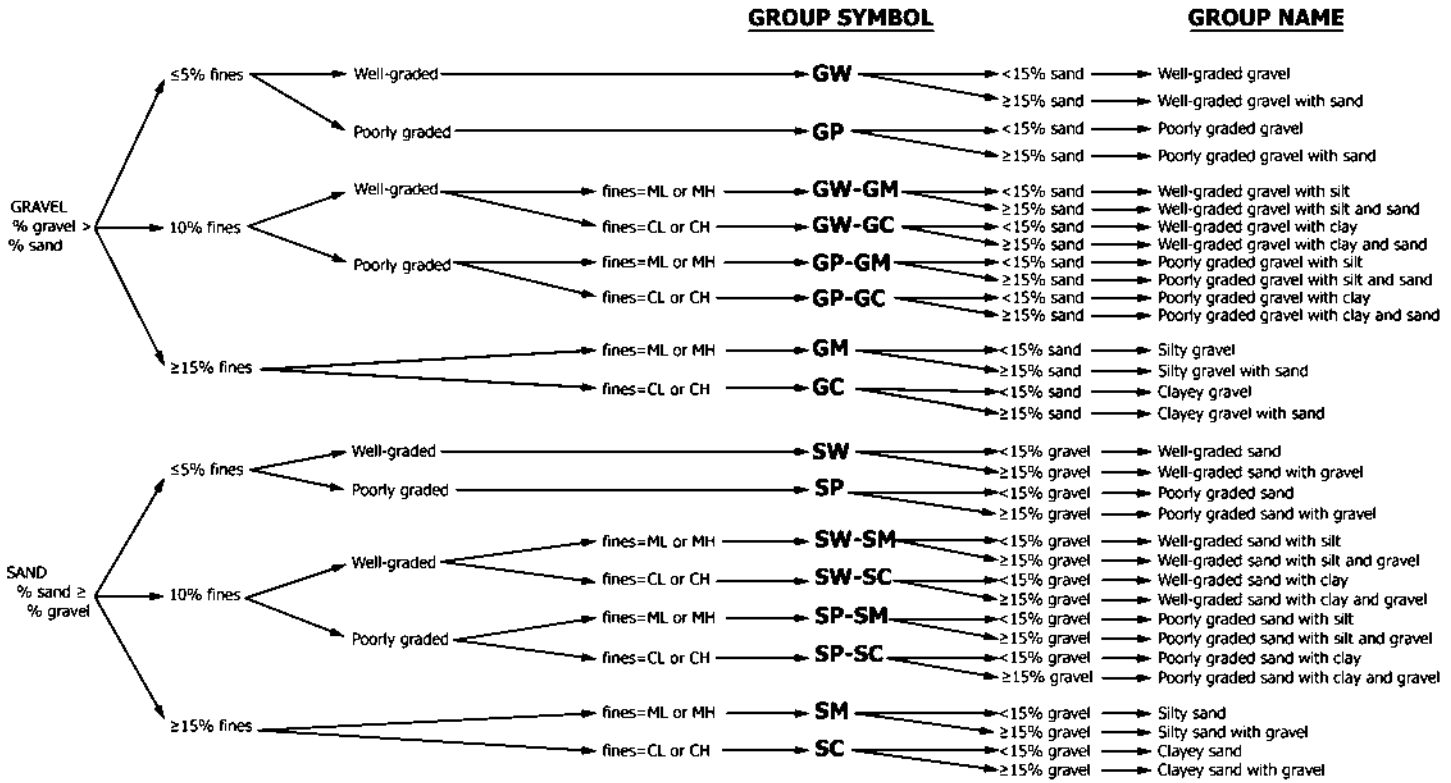
6.2.1 *Test Tube and Stopper (or jar with a lid).*

6.2.2 *Hand Lens.*

7. Reagents

7.1 *Purity of Water*—Unless otherwise indicated, references to water shall be understood to mean water from a city water supply or natural source, including non-potable water.

7.2 *Hydrochloric Acid*—A small bottle of dilute hydrochloric acid, HCl, one part HCl (10 N) to three parts water (This reagent is optional for use with this practice). See Section 8.



NOTE 1—Percentages are based on estimating amounts of fines, sand, and gravel to the nearest 5 %.

FIG. 2 Flow Chart for Identifying Coarse-Grained Soils (less than 50 % fines)

8. Safety Precautions

8.1 When preparing the dilute HCl solution of one part concentrated hydrochloric acid (10 N) to three parts of distilled water, slowly add acid into water following necessary safety precautions. Handle with caution and store safely. If solution comes into contact with the skin, rinse thoroughly with water.

8.2 **Caution**—Do not add water to acid.

9. Sampling

9.1 The sample shall be considered to be representative of the stratum from which it was obtained by an appropriate, accepted, or standard procedure.

NOTE 6—Preferably, the sampling procedure should be identified as having been conducted in accordance with Practices D1452, D1587, or D2113, or Test Method D1586.

9.2 The sample shall be carefully identified as to origin.

NOTE 7—Remarks as to the origin may take the form of a boring number and sample number in conjunction with a job number, a geologic stratum, a pedologic horizon or a location description with respect to a permanent monument, a grid system or a station number and offset with respect to a stated centerline and a depth or elevation.

9.3 For accurate description and identification, the minimum amount of the specimen to be examined shall be in accordance with the following schedule:

Maximum Particle Size, Sieve Opening	Minimum Specimen Size, Dry Weight
4.75 mm (No. 4)	100 g (0.25 lb)
9.5 mm (¾ in.)	200 g (0.5 lb)
19.0 mm (¾ in.)	1.0 kg (2.2 lb)
38.1 mm (1½ in.)	8.0 kg (18 lb)
75.0 mm (3 in.)	60.0 kg (132 lb)

NOTE 8—If random isolated particles are encountered that are significantly larger than the particles in the soil matrix, the soil matrix can be accurately described and identified in accordance with the preceding schedule.

9.4 If the field sample or specimen being examined is smaller than the minimum recommended amount, the report shall include an appropriate remark.

10. Descriptive Information for Soils

10.1 *Angularity*—Describe the angularity of the sand (coarse sizes only), gravel, cobbles, and boulders, as angular, subangular, subrounded, or rounded in accordance with the criteria in Table 1 and Fig. 3. A range of angularity may be stated, such as: subrounded to rounded.

10.2 *Shape*—Describe the shape of the gravel, cobbles, and boulders as flat, elongated, or flat and elongated if they meet the criteria in Table 2 and Fig. 4. Otherwise, do not mention the shape. Indicate the fraction of the particles that have the shape, such as: one-third of the gravel particles are flat.

TABLE 1 Criteria for Describing Angularity of Coarse-Grained Particles (see Fig. 3)

Description	Criteria
Angular	Particles have sharp edges and relatively plane sides with unpolished surfaces
Subangular	Particles are similar to angular description but have rounded edges
Subrounded	Particles have nearly plane sides but have well-rounded corners and edges
Rounded	Particles have smoothly curved sides and no edges

10.3 *Color*—Describe the color. Color is an important property in identifying organic soils, and within a given locality it may also be useful in identifying materials of similar geologic origin. If the sample contains layers or patches of varying colors, this shall be noted and all representative colors shall be described. The color shall be described for moist samples. If the color represents a dry condition, this shall be stated in the report.

10.4 *Odor*—Describe the odor if organic or unusual. Soils containing a significant amount of organic material usually have a distinctive odor of decaying vegetation. This is especially apparent in fresh samples, but if the samples are dried, the odor may often be revived by heating a moistened sample. If the odor is unusual (petroleum product, chemical, and the like), it shall be described.

10.5 *Moisture Condition*—Describe the moisture condition as dry, moist, or wet, in accordance with the criteria in Table 3.

10.6 *HCl Reaction*—Describe the reaction with HCl as none, weak, or strong, in accordance with the criteria in Table 4. Since calcium carbonate is a common cementing agent, a report of its presence on the basis of the reaction with dilute hydrochloric acid is important.

10.7 *Consistency*—For intact fine-grained soil, describe the consistency as very soft, soft, firm, hard, or very hard, in accordance with the criteria in Table 5. This observation is inappropriate for soils with significant amounts of gravel.

10.8 *Cementation*—Describe the cementation of intact coarse-grained soils as weak, moderate, or strong, in accordance with the criteria in Table 6.

10.9 *Structure*—Describe the structure of intact soils in accordance with the criteria in Table 7.

10.10 *Range of Particle Sizes*—For gravel and sand components, describe the range of particle sizes within each component as defined in 3.1.2 and 3.1.6. For example, about 20 % fine to coarse gravel, about 40 % fine to coarse sand.

10.11 *Maximum Particle Size*—Describe the maximum particle size found in the sample in accordance with the following information:

10.11.1 *Sand Size*—If the maximum particle size is a sand size, describe as fine, medium, or coarse as defined in 3.1.6. For example: maximum particle size, medium sand.

10.11.2 *Gravel Size*—If the maximum particle size is a gravel size, describe the maximum particle size as the smallest sieve opening that the particle will pass. For example, maxi-

mum particle size, 1½ in. (will pass a 1½-in. square opening but not a ¾-in. square opening).

10.11.3 *Cobble or Boulder Size*—If the maximum particle size is a cobble or boulder size, describe the maximum dimension of the largest particle. For example: maximum dimension, 18 in. (450 mm).

10.12 *Hardness*—Describe the hardness of coarse sand and larger particles as hard, or state what happens when the particles are hit by a hammer, for example, gravel-size particles fracture with considerable hammer blow, some gravel-size particles crumble with hammer blow. “Hard” means particles do not crack, fracture, or crumble under a hammer blow.

10.13 Additional comments shall be noted, such as the presence of roots or root holes, difficulty in drilling or augering hole, caving of trench or hole, or the presence of mica.

10.14 A local or commercial name or a geologic interpretation of the soil, or both, may be added if identified as such.

10.15 A classification or identification of the soil in accordance with other classification systems may be added if identified as such.

11. Identification of Peat

11.1 A sample composed primarily of vegetable tissue in various stages of decomposition that has a fibrous to amorphous texture, usually a dark brown to black color, and an organic odor, shall be designated as a highly organic soil and shall be identified as peat, PT, and not subjected to the identification procedures described hereafter.

12. Preparation for Identification

12.1 The soil identification portion of this practice is based on the portion of the soil sample that will pass a 3-in. (75-mm) sieve. The larger than 3-in. (75-mm) particles must be removed, manually, for a loose sample, or mentally, for an intact sample before classifying the soil.

12.2 Estimate and note the percentage of cobbles and the percentage of boulders. Performed visually, these estimates will be on the basis of volume percentage.

NOTE 9—Since the percentages of the particle-size distribution in Test Method D2487 are by dry weight, and the estimates of percentages for gravel, sand, and fines in this practice are by dry weight, it is recommended that the report state that the percentages of cobbles and boulders are by volume.

12.3 Of the fraction of the soil smaller than 3 in. (75 mm), estimate and note the percentage, by dry weight, of the gravel, sand, and fines (see Appendix X4 for suggested procedures).

NOTE 10—Since the particle-size components appear visually on the basis of volume, considerable experience is required to estimate the percentages on the basis of dry weight. Frequent comparisons with laboratory particle-size analyses should be made.

12.3.1 The percentages shall be estimated to the closest 5 %. The percentages of gravel, sand, and fines must add up to 100 %.

12.3.2 If one of the components is present but not in sufficient quantity to be considered 5 % of the smaller than 3-in. (75-mm) portion, indicate its presence by the term *trace*,

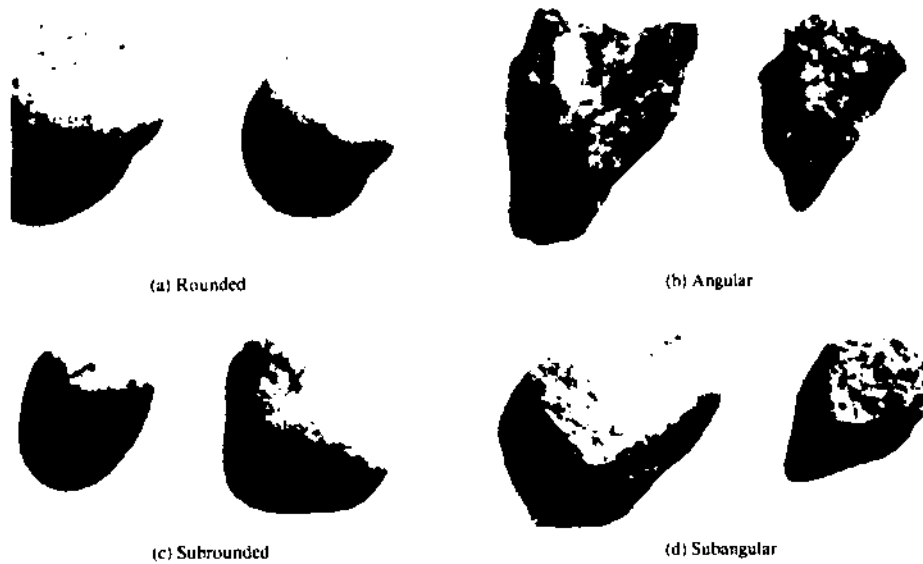


FIG. 3 Typical Angularity of Bulky Grains

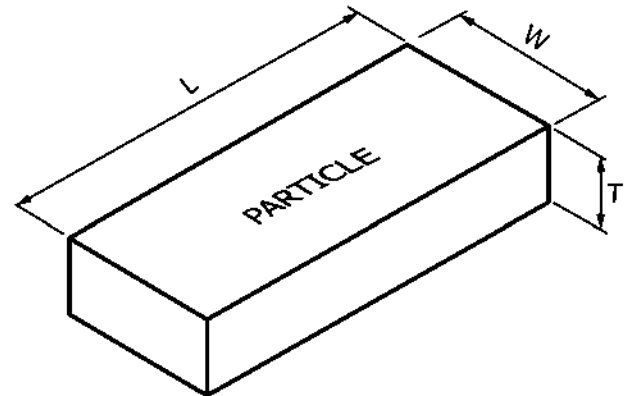
TABLE 2 Criteria for Describing Particle Shape (see Fig. 4)

The particle shape shall be described as follows where length, width, and thickness refer to the greatest, intermediate, and least dimensions of a particle, respectively.

Flat	Particles with width/thickness > 3
Elongated	Particles with length/width > 3
Flat and elongated	Particles meet criteria for both flat and elongated

PARTICLE SHAPE

W = WIDTH
T = THICKNESS
L = LENGTH



FLAT: $W/T > 3$
 ELONGATED: $L/W > 3$
 FLAT AND ELONGATED:
 – meets both criteria

FIG. 4 Criteria for Particle Shape

for example, trace of fines. A trace is not to be considered in the total of 100 % for the components.

13. Preliminary Identification

13.1 The soil is *fine grained* if it contains 50 % or more fines. Follow the procedures for identifying fine-grained soils of Section 14.

13.2 The soil is *coarse grained* if it contains less than 50 % fines. Follow the procedures for identifying coarse-grained soils of Section 15.

14. Procedure for Identifying Fine-Grained Soils

14.1 Select a representative sample of the material for examination. Remove particles larger than the No. 40 sieve (medium sand and larger) until a specimen equivalent to about a handful of material is available. Use this specimen for performing the dry strength, dilatancy, and toughness tests.

14.2 Dry Strength:

14.2.1 From the specimen, select enough material to mold into a ball about 1 in. (25 mm) in diameter. Mold the material until it has the consistency of putty, adding water if necessary.

14.2.2 From the molded material, make at least three test specimens. A test specimen shall be a ball of material about 1/2

TABLE 3 Criteria for Describing Moisture Condition

Description	Criteria
Dry	Absence of moisture, dusty, dry to the touch
Moist	Damp but no visible water
Wet	Visible free water, usually soil is below water table

TABLE 4 Criteria for Describing the Reaction With HCl

Description	Criteria
None	No visible reaction
Weak	Some reaction, with bubbles forming slowly
Strong	Violent reaction, with bubbles forming immediately

TABLE 5 Criteria for Describing Consistency

Description	Criteria
Very soft	Thumb will penetrate soil more than 1 in. (25 mm)
Soft	Thumb will penetrate soil about 1 in. (25 mm)
Firm	Thumb will indent soil about ¼ in. (6 mm)
Hard	Thumb will not indent soil but readily indented with thumbnail
Very hard	Thumbnail will not indent soil

TABLE 6 Criteria for Describing Cementation

Description	Criteria
Weak	Crumbles or breaks with handling or little finger pressure
Moderate	Crumbles or breaks with considerable finger pressure
Strong	Will not crumble or break with finger pressure

TABLE 7 Criteria for Describing Structure

Description	Criteria
Stratified	Alternating layers of varying material or color with layers at least 6 mm thick; note thickness
Laminated	Alternating layers of varying material or color with the layers less than 6 mm thick; note thickness
Fissured	Breaks along definite planes of fracture with little resistance to fracturing
Slickensided	Fracture planes appear polished or glossy, sometimes striated
Blocky	Cohesive soil that can be broken down into small angular lumps which resist further breakdown
Lensed	Inclusion of small pockets of different soils, such as small lenses of sand scattered through a mass of clay; note thickness
Homogeneous	Same color and appearance throughout

in. (12 mm) in diameter. Allow the test specimens to dry in air, or sun, or by artificial means, as long as the temperature does not exceed 60°C.

14.2.3 If the test specimen contains natural dry lumps, those that are about ½ in. (12 mm) in diameter may be used in place of the molded balls.

NOTE 11—The process of molding and drying usually produces higher strengths than are found in natural dry lumps of soil.

14.2.4 Test the strength of the dry balls or lumps by crushing between the fingers. Note the strength as none, low, medium, high, or very high in accordance with the criteria in Table 8. If natural dry lumps are used, do not use the results of any of the lumps that are found to contain particles of coarse sand.

14.2.5 The presence of high-strength water-soluble cementing materials, such as calcium carbonate, may cause excep-

TABLE 8 Criteria for Describing Dry Strength

Description	Criteria
None	The dry specimen crumbles into powder with mere pressure of handling
Low	The dry specimen crumbles into powder with some finger pressure
Medium	The dry specimen breaks into pieces or crumbles with considerable finger pressure
High	The dry specimen cannot be broken with finger pressure. Specimen will break into pieces between thumb and a hard surface
Very high	The dry specimen cannot be broken between the thumb and a hard surface

tionally high dry strengths. The presence of calcium carbonate can usually be detected from the intensity of the reaction with dilute hydrochloric acid (see 10.6).

14.3 Dilatancy:

14.3.1 From the specimen, select enough material to mold into a ball about ½ in. (12 mm) in diameter. Mold the material, adding water if necessary, until it has a soft, but not sticky, consistency.

14.3.2 Smooth the soil ball in the palm of one hand with the blade of a knife or small spatula. Shake horizontally, striking the side of the hand vigorously against the other hand several times. Note the reaction of water appearing on the surface of the soil. Squeeze the sample by closing the hand or pinching the soil between the fingers, and note the reaction as none, slow, or rapid in accordance with the criteria in Table 9. The reaction is the speed with which water appears while shaking, and disappears while squeezing.

14.4 Toughness:

14.4.1 Following the completion of the dilatancy test, the test specimen is shaped into an elongated pat and rolled by hand on a smooth surface or between the palms into a thread about ⅛ in. (3 mm) in diameter. (If the sample is too wet to roll easily, it should be spread into a thin layer and allowed to lose some water by evaporation.) Fold the sample threads and reroll repeatedly until the thread crumbles at a diameter of about ⅛ in. The thread will crumble at a diameter of ⅛ in. when the soil is near the plastic limit. Note the pressure required to roll the thread near the plastic limit. Also, note the strength of the thread. After the thread crumbles, the pieces should be lumped together and kneaded until the lump crumbles. Note the toughness of the material during kneading.

14.4.2 Describe the toughness of the thread and lump as low, medium, or high in accordance with the criteria in Table 10.

TABLE 9 Criteria for Describing Dilatancy

Description	Criteria
None	No visible change in the specimen
Slow	Water appears slowly on the surface of the specimen during shaking and does not disappear or disappears slowly upon squeezing
Rapid	Water appears quickly on the surface of the specimen during shaking and disappears quickly upon squeezing

TABLE 10 Criteria for Describing Toughness

Description	Criteria
Low	Only slight pressure is required to roll the thread near the plastic limit. The thread and the lump are weak and soft
Medium	Medium pressure is required to roll the thread to near the plastic limit. The thread and the lump have medium stiffness
High	Considerable pressure is required to roll the thread to near the plastic limit. The thread and the lump have very high stiffness

14.5 *Plasticity*—On the basis of observations made during the toughness test, describe the plasticity of the material in accordance with the criteria given in Table 11.

14.6 Decide whether the soil is an *inorganic* or an *organic* fine-grained soil (see 14.8). If inorganic, follow the steps given in 14.7.

14.7 Identification of Inorganic Fine-Grained Soils:

14.7.1 Identify the soil as a *lean clay*, CL, if the soil has medium to high dry strength, no or slow dilatancy, and medium toughness and plasticity (see Table 12).

14.7.2 Identify the soil as a *fat clay*, CH, if the soil has high to very high dry strength, no dilatancy, and high toughness and plasticity (see Table 12).

14.7.3 Identify the soil as a *silt*, ML, if the soil has no to low dry strength, slow to rapid dilatancy, and low toughness and plasticity, or is nonplastic (see Table 12).

14.7.4 Identify the soil as an *elastic silt*, MH, if the soil has low to medium dry strength, no to slow dilatancy, and low to medium toughness and plasticity (see Table 12).

NOTE 12—These properties are similar to those for a lean clay. However, the silt will dry quickly on the hand and have a smooth, silky feel when dry. Some soils that would classify as MH in accordance with the criteria in Test Method D2487 are visually difficult to distinguish from lean clays, CL. It may be necessary to perform laboratory testing for proper identification.

14.8 Identification of Organic Fine-Grained Soils:

14.8.1 Identify the soil as an *organic soil*, OL/OH, if the soil contains enough organic particles to influence the soil properties. Organic soils usually have a dark brown to black color and may have an organic odor. Often, organic soils will change color, for example, black to brown, when exposed to the air. Some organic soils will lighten in color significantly when air dried. Organic soils normally will not have a high toughness or plasticity. The thread for the toughness test will be spongy.

NOTE 13—In some cases, through practice and experience, it may be possible to further identify the organic soils as organic silts or organic

TABLE 11 Criteria for Describing Plasticity

Description	Criteria
Nonplastic	A 1/8-in. (3-mm) thread cannot be rolled at any water content
Low	The thread can barely be rolled and the lump cannot be formed when drier than the plastic limit
Medium	The thread is easy to roll and not much time is required to reach the plastic limit. The thread cannot be rerolled after reaching the plastic limit. The lump crumbles when drier than the plastic limit
High	It takes considerable time rolling and kneading to reach the plastic limit. The thread can be rerolled several times after reaching the plastic limit. The lump can be formed without crumbling when drier than the plastic limit

TABLE 12 Identification of Inorganic Fine-Grained Soils from Manual Tests

Soil Symbol	Dry Strength	Dilatancy	Toughness and Plasticity
ML	None to low	Slow to rapid	Low or thread cannot be formed
CL	Medium to high	None to slow	Medium
MH	Low to medium	None to slow	Low to medium
CH	High to very high	None	High

clays, OL or OH. Correlations between the dilatancy, dry strength, toughness tests, and laboratory tests can be made to identify organic soils in certain deposits of similar materials of known geologic origin.

14.9 If the soil is estimated to have 15 to 25 % sand or gravel, or both, the words “with sand” or “with gravel” (whichever is more predominant) shall be added to the group name. For example: “lean clay with sand, CL” or “silt with gravel, ML” (see Fig. 1a and Fig. 1b). If the percentage of sand is equal to the percentage of gravel, use “with sand.”

14.10 If the soil is estimated to have 30 % or more sand or gravel, or both, the words “sandy” or “gravelly” shall be added to the group name. Add the word “sandy” if there appears to be more sand than gravel. Add the word “gravelly” if there appears to be more gravel than sand. For example: “sandy lean clay, CL”, “gravelly fat clay, CH”, or “sandy silt, ML” (see Fig. 1a and Fig. 1b). If the percentage of sand is equal to the percent of gravel, use “sandy.”

15. Procedure for Identifying Coarse-Grained Soils (Contains less than 50 % fines)

15.1 The soil is a *gravel* if the percentage of gravel is estimated to be more than the percentage of sand.

15.2 The soil is a *sand* if the percentage of gravel is estimated to be equal to or less than the percentage of sand.

15.3 The soil is a *clean gravel* or *clean sand* if the percentage of fines is estimated to be 5 % or less.

15.3.1 Identify the soil as a *well-graded gravel*, GW, or as a *well-graded sand*, SW, if it has a wide range of particle sizes and substantial amounts of the intermediate particle sizes.

15.3.2 Identify the soil as a *poorly graded gravel*, GP, or as a *poorly graded sand*, SP, if it consists predominantly of one size (uniformly graded), or it has a wide range of sizes with some intermediate sizes obviously missing (gap or skip graded).

15.4 The soil is either a *gravel with fines* or a *sand with fines* if the percentage of fines is estimated to be 15 % or more.

15.4.1 Identify the soil as a *clayey gravel*, GC, or a *clayey sand*, SC, if the fines are clayey as determined by the procedures in Section 14.

15.4.2 Identify the soil as a *silty gravel*, GM, or a *silty sand*, SM, if the fines are silty as determined by the procedures in Section 14.

15.5 If the soil is estimated to contain 10 % fines, give the soil a dual identification using two group symbols.

15.5.1 The first group symbol shall correspond to a clean gravel or sand (GW, GP, SW, SP) and the second symbol shall correspond to a gravel or sand with fines (GC, GM, SC, SM).

TABLE 13 Checklist for Description of Soils

1. Group name
2. Group symbol
3. Percent of cobbles or boulders, or both (by volume)
4. Percent of gravel, sand, or fines, or all three (by dry weight)
5. Particle-size range: Gravel—fine, coarse Sand—fine, medium, coarse
6. Particle angularity: angular, subangular, subrounded, rounded
7. Particle shape: (if appropriate) flat, elongated, flat and elongated
8. Maximum particle size or dimension
9. Hardness of coarse sand and larger particles
10. Plasticity of fines: nonplastic, low, medium, high
11. Dry strength: none, low, medium, high, very high
12. Dilatancy: none, slow, rapid
13. Toughness: low, medium, high
14. Color (in moist condition)
15. Odor (mention only if organic or unusual)
16. Moisture: dry, moist, wet
17. Reaction with HCl: none, weak, strong
For intact samples:
18. Consistency (fine-grained soils only): very soft, soft, firm, hard, very hard
19. Structure: stratified, laminated, fissured, slickensided, lensed, homogeneous
20. Cementation: weak, moderate, strong
21. Local name
22. Geologic interpretation
23. Additional comments: presence of roots or root holes, presence of mica, gypsum, etc., surface coatings on coarse-grained particles, caving or sloughing of auger hole or trench sides, difficulty in augering or excavating, etc.

Method D2487, it must be distinctly and clearly stated in log forms, summary tables, reports, and the like, that the symbol and name are based on visual-manual procedures.

17. Precision and Bias

17.1 This practice provides qualitative information only, therefore, a precision and bias statement is not applicable.

18. Keywords

18.1 classification; clay; gravel; organic soils; sand; silt; soil classification; soil description; visual classification

15.5.2 The group name shall correspond to the first group symbol plus the words “with clay” or “with silt” to indicate the plasticity characteristics of the fines. For example: “well-graded gravel with clay, GW-GC” or “poorly graded sand with silt, SP-SM” (see Fig. 2).

15.6 If the specimen is predominantly sand or gravel but contains an estimated 15 % or more of the other coarse-grained constituent, the words “with gravel” or “with sand” shall be added to the group name. For example: “poorly graded gravel with sand, GP” or “clayey sand with gravel, SC” (see Fig. 2).

15.7 If the field sample contains any cobbles or boulders, or both, the words “with cobbles” or “with cobbles and boulders” shall be added to the group name. For example: “silty gravel with cobbles, GM.”

16. Report

16.1 The report shall include the information as to origin, and the items indicated in Table 13.

NOTE 14—*Example: Clayey Gravel with Sand and Cobbles, GC*—About 50 % fine to coarse, subrounded to subangular gravel; about 30 % fine to coarse, subrounded sand; about 20 % fines with medium plasticity, high dry strength, no dilatancy, medium toughness; weak reaction with HCl; original field sample had about 5 % (by volume) subrounded cobbles, maximum dimension, 150 mm.

In-Place Conditions—Firm, homogeneous, dry, brown

Geologic Interpretation—Alluvial fan

NOTE 15—Other examples of soil descriptions and identification are given in Appendix X1 and Appendix X2.

NOTE 16—If desired, the percentages of gravel, sand, and fines may be stated in terms indicating a range of percentages, as follows:

Trace—Particles are present but estimated to be less than 5 %

Few—5 to 10 %

Little—15 to 25 %

Some—30 to 45 %

Mostly—50 to 100 %

16.2 If, in the soil description, the soil is identified using a classification group symbol and name as described in Test

APPENDICES

(Nonmandatory Information)

X1. EXAMPLES OF VISUAL SOIL DESCRIPTIONS

X1.1 The following examples show how the information required in 16.1 can be reported. The information that is included in descriptions should be based on individual circumstances and need.

X1.1.1 *Well-Graded Gravel with Sand (GW)*—About 75 % fine to coarse, hard, subangular gravel; about 25 % fine to coarse, hard, subangular sand; trace of fines; maximum size, 75 mm, brown, dry; no reaction with HCl.

X1.1.2 *Silty Sand with Gravel (SM)*—About 60 % predominantly fine sand; about 25 % silty fines with low plasticity, low dry strength, rapid dilatancy, and low toughness; about 15 % fine, hard, subrounded gravel, a few gravel-size particles

fractured with hammer blow; maximum size, 25 mm; no reaction with HCl (Note—Field sample size smaller than recommended).

In-Place Conditions—Firm, stratified and contains lenses of silt 1 to 2 in. (25 to 50 mm) thick, moist, brown to gray; in-place density 106 lb/ft³; in-place moisture 9 %.

X1.1.3 *Organic Soil (OL/OH)*—About 100 % fines with low plasticity, slow dilatancy, low dry strength, and low toughness; wet, dark brown, organic odor; weak reaction with HCl.

X1.1.4 *Silty Sand with Organic Fines (SM)*—About 75 % fine to coarse, hard, subangular reddish sand; about 25 % organic and silty dark brown nonplastic fines with no dry

strength and slow dilatancy; wet; maximum size, coarse sand; weak reaction with HCl.

X1.1.5 *Poorly Graded Gravel with Silt, Sand, Cobbles and Boulders (GP-GM)*—About 75 % fine to coarse, hard, sub-rounded to subangular gravel; about 15 % fine, hard, sub-

rounded to subangular sand; about 10 % silty nonplastic fines; moist, brown; no reaction with HCl; original field sample had about 5 % (by volume) hard, subrounded cobbles and a trace of hard, subrounded boulders, with a maximum dimension of 18 in. (450 mm).

X2. USING THE IDENTIFICATION PROCEDURE AS A DESCRIPTIVE SYSTEM FOR SHALE, CLAYSTONE, SHELLS, SLAG, CRUSHED ROCK, AND THE LIKE

X2.1 The identification procedure may be used as a descriptive system applied to materials that exist in-situ as shale, claystone, sandstone, siltstone, mudstone, etc., but convert to soils after field or laboratory processing (crushing, slaking, and the like).

X2.2 Materials such as shells, crushed rock, slag, and the like, should be identified as such. However, the procedures used in this practice for describing the particle size and plasticity characteristics may be used in the description of the material. If desired, an identification using a group name and symbol according to this practice may be assigned to aid in describing the material.

X2.3 The group symbol(s) and group names should be placed in quotation marks or noted with some type of distinguishing symbol. See examples.

X2.4 Examples of how group names and symbols can be incorporated into a descriptive system for materials that are not naturally occurring soils are as follows:

X2.4.1 *Shale Chunks*—Retrieved as 2 to 4-in. (50 to 100-mm) pieces of shale from power auger hole, dry, brown, no reaction with HCl. After slaking in water for 24 h, material identified as “Sandy Lean Clay (CL)”; about 60 % fines with medium plasticity, high dry strength, no dilatancy, and medium toughness; about 35 % fine to medium, hard sand; about 5 % gravel-size pieces of shale.

X2.4.2 *Crushed Sandstone*—Product of commercial crushing operation; “Poorly Graded Sand with Silt (SP-SM)”; about 90 % fine to medium sand; about 10 % nonplastic fines; dry, reddish-brown.

X2.4.3 *Broken Shells*—About 60 % uniformly graded gravel-size broken shells; about 30 % sand and sand-size shell pieces; about 10 % nonplastic fines; “Poorly Graded Gravel with Silt and Sand (GP-GM).”

X2.4.4 *Crushed Rock*—Processed from gravel and cobbles in Pit No. 7; “Poorly Graded Gravel (GP)”; about 90 % fine, hard, angular gravel-size particles; about 10 % coarse, hard, angular sand-size particles; dry, tan; no reaction with HCl.

X3. SUGGESTED PROCEDURE FOR USING A BORDERLINE SYMBOL FOR SOILS WITH TWO POSSIBLE IDENTIFICATIONS.

X3.1 Since this practice is based on estimates of particle size distribution and plasticity characteristics, it may be difficult to clearly identify the soil as belonging to one category. To indicate that the soil may fall into one of two possible basic groups, a borderline symbol may be used with the two symbols separated by a slash. For example: SC/CL or CL/CH.

X3.1.1 A borderline symbol may be used when the percentage of fines is estimated to be between 45 and 55 %. One symbol should be for a coarse-grained soil with fines and the other for a fine-grained soil. For example: GM/ML or CL/SC.

X3.1.2 A borderline symbol may be used when the percentage of sand and the percentage of gravel are estimated to be about the same. For example: GP/SP, SC/GC, GM/SM. It is practically impossible to have a soil that would have a borderline symbol of GW/SW.

X3.1.3 A borderline symbol may be used when the soil could be either well graded or poorly graded. For example: GW/GP, SW/SP.

X3.1.4 A borderline symbol may be used when the soil could either be a silt or a clay. For example: CL/ML, CH/MH, SC/SM.

X3.1.5 A borderline symbol may be used when a fine-grained soil has properties that indicate that it is at the boundary between a soil of low compressibility and a soil of high compressibility. For example: CL/CH, MH/ML.

X3.2 The order of the borderline symbols should reflect similarity to surrounding or adjacent soils. For example: soils in a borrow area have been identified as CH. One sample is considered to have a borderline symbol of CL and CH. To show similarity, the borderline symbol should be CH/CL.

X3.3 The group name for a soil with a borderline symbol should be the group name for the first symbol, except for:

CL/CH lean to fat clay
ML/CL clayey silt
CL/ML silty clay

X3.4 The use of a borderline symbol should not be used indiscriminately. Every effort shall be made to first place the soil into a single group.

X4. SUGGESTED PROCEDURES FOR ESTIMATING THE PERCENTAGES OF GRAVEL, SAND, AND FINES IN A SOIL SAMPLE

X4.1 Jar Method—The relative percentage of coarse- and fine-grained material may be estimated by thoroughly shaking a mixture of soil and water in a test tube or jar, and then allowing the mixture to settle. The coarse particles will fall to the bottom and successively finer particles will be deposited with increasing time; the sand sizes will fall out of suspension in 20 to 30 s. The relative proportions can be estimated from the relative volume of each size separate. This method should be correlated to particle-size laboratory determinations.

X4.2 Visual Method—Mentally visualize the gravel size particles placed in a sack (or other container) or sacks. Then, do the same with the sand size particles and the fines. Then, mentally compare the number of sacks to estimate the percentage of plus No. 4 sieve size and minus No. 4 sieve size present.

The percentages of sand and fines in the minus sieve size No. 4 material can then be estimated from the wash test (X4.3).

X4.3 Wash Test (for relative percentages of sand and fines)—Select and moisten enough minus No. 4 sieve size material to form a 1-in (25-mm) cube of soil. Cut the cube in half, set one-half to the side, and place the other half in a small dish. Wash and decant the fines out of the material in the dish until the wash water is clear and then compare the two samples and estimate the percentage of sand and fines. Remember that the percentage is based on weight, not volume. However, the volume comparison will provide a reasonable indication of grain size percentages.

X4.3.1 While washing, it may be necessary to break down lumps of fines with the finger to get the correct percentages.

X5. ABBREVIATED SOIL CLASSIFICATION SYMBOLS

X5.1 In some cases, because of lack of space, an abbreviated system may be useful to indicate the soil classification symbol and name. Examples of such cases would be graphical logs, databases, tables, etc.

X5.2 This abbreviated system is not a substitute for the full name and descriptive information but can be used in supplementary presentations when the complete description is referenced.

X5.3 The abbreviated system should consist of the soil classification symbol based on this standard with appropriate lower case letter prefixes and suffixes as:

Prefix:	Suffix:
s = sandy	s = with sand
g = gravelly	g = with gravel
	c = with cobbles
	b = with boulders

X5.4 The soil classification symbol is to be enclosed in parenthesis. Some examples would be:

Group Symbol and Full Name	Abbreviated
CL, Sandy lean clay	s(CL)
SP-SM, Poorly graded sand with silt and gravel	(SP-SM)g
GP, poorly graded gravel with sand, cobbles, and boulders	(GP)scb
ML, gravelly silt with sand and cobbles	g(ML)sc

SUMMARY OF CHANGES

Committee D18 has identified the location of selected changes to this standard since the last issue (D2488 – 09) that may impact the use of this standard. (Approved June 15, 2009.)

(1) Revised Section 1.2.3.

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