From: Howell, Tonya
To: Meyer, Lisa A
Cc: Miller, Barbara J (BMiller2@ameren.com)
Subject: RE: Ameren Huster DPT Work Plan
Date: Tuesday, September 27, 2022 12:29:00 PM

Lisa, below are some additional specific comments on the DPT Work Plan:

1. **General Comment.** Consider also incorporating electrical conductivity and hydraulic profiling tool direct-push technology (DPT) tools to better characterize hydrogeological conditions in the area.

2. **General Comment.** Consider subsurface direct-detection DPT tools such as the XSD halogen-specific detector to assist in screening discrete portions of the alluvial aquifer.

3. **Section 1, Background, second paragraph.** Please clarify if "remediation activities at the Site have been ongoing since April 2014" is referring to Operable Unit (OU) 4 since remedial activities at OU1 and OU3 have been ongoing far longer.

4. **Section 2, Scope of Work.** Reference should be made to the site-specific Quality Assurance Project Plan.

5. **Section 2.1, Borehole Logging.** Please clarify if logging will (assumedly) be only performed on subsurface soil samples since groundwater DPT samples will not produce cuttings. Please also clarify the length of the coring device to be used (five foot MacroCore, etc.).

6. **Section 2.2, Sampling Details.** A deeper groundwater sampling interval consistent with the screened interval of CW-6 should also be considered.

7. **Section 2.2, Sampling Details.** Please clarify if the deepest groundwater sampling interval will be first, and then the tools retrieved to shallower intervals or if discrete boreholes will be utilized.

8. **Section 2**.2, S**ampling Details, final paragraph on Page 3**. Please clarify what a "representative sample" is.

9. **Section 2.2**, S**ampling Details, final paragraph on Page 3**. For soil samples below the saturated zone, it will be difficult to attribute concentrations between downward migration from the vadose zone or diffusion from groundwater to the subsurface soil matrix. Consider taking subsurface soil samples above the saturated zone. Seasonal variations in the water table should also be considered when interpreting the data.

10. **Section 2.2, Sampling Details, first paragraph on Page 4.** The specific standard operating procedures for characterizing and managing investigation-derived wastes should referenced.

11. **Section 3, Laboratory Analytical Services.** Data validation should be described and standard

operating procedures for data validation should be referenced.

Tonya Howell
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913-551-7589

From: Meyer, Lisa A <LMeyer2@ameren.com>
Sent: Friday, September 02, 2022 2:14 PM
To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Sperry, Clint <Sperry.Clint@epa.gov>; Miller, Barbara J <BMiller2@ameren.com>; Derek D. Ingram <ddingram@loureiro.com>; Meyer, Lisa A <LMeyer2@ameren.com>
Subject: Ameren Huster DPT Work Plan

Tonya,

Attached is the proposed DPT work plan for Huster. The Huster Groundwater Monitoring Plan should be coming your way shortly.

Should I forward this to the City of St. Charles/212 yet, or wait for your review?
Thanks and have a wonderful holiday weekend!

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