From:	Howell, Tonya
To:	Meyer, Lisa A
Cc:	Sperry, Clint; Giesmann, Craig J; Miller, Barbara J; Derek D. Ingram; Karen L. Harris
Subject:	RE: Ameren Huster Substation QAPP and GWMP - 1 of 3
Date:	Wednesday, January 11, 2023 11:17:00 AM
Attachments:	2023046 printed signed Huster QAPP_01-09-23 FINAL.pdf image002.png

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Lisa,

The review of the **revised** "Quality Assurance Project Plan (QAPP), Ameren Missouri Findett Corporation/Hayford Bridge Road OU4 Huster Road Substation; St. Charles, Missouri" prepared by Ameren and dated December 2022 has been completed according to "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001.

The revised document addressed EPA's critical comments and has been approved (see attached). Although the document satisfactorily addresses most of the key elements, one minor issue was noted which is summarized below as a general comment. This issue does not have an impact on the approval of the document but is noteworthy of pointing out for the record.

General Comment

§ 1.6 Quality Objectives and Measurement Criteria for Data, page 11. Clarification was requested regarding any concern for and evaluation of the data quality indicators (DQIs) completeness, representativeness, and comparability. The revised QAPP does now indicate these DQIs are of concern and the QC requirements outlined in Tables 2-4A, 2-4B, and 2-5 will be used to meet these DQIs. Based on this information, it appears the following applies:

a. For completeness, there seems to be an implied completeness goal of 100% because if specific QC requirements cause results to be excluded, an attempt will be made to resample.

b. For representativeness, it appears the described sampling design is intended to ensure representativeness along with the collection of field blanks, equipment blanks, and trip blanks, all of which can contribute to an evaluation of representativeness.

c. For comparability, the QAPP now clearly states that data are obtained only from this site, and it appears this will help ensure comparability since the same methods, procedures, and reporting requirements would apply to all data obtained by this facility for this site.

Tonya Howell
Remedial Project Manager / Superfund Redevelopment Coordinator
Superfund and Emergency Management Division
U.S. Environmental Protection Agency, Region 7
913-551-7589

From: Meyer, Lisa A <LMeyer2@ameren.com>
Sent: Monday, January 09, 2023 6:09 PM
To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Sperry, Clint <Sperry.Clint@epa.gov>; Giesmann, Craig J <CGiesmann@ameren.com>; Miller, Barbara J <BMiller2@ameren.com>; Derek D. Ingram <ddingram@loureiro.com>; Karen L. Harris <klharris@loureiro.com>; Meyer, Lisa A <LMeyer2@ameren.com>
Subject: Ameren Huster Substation QAPP and GWMP - 1 of 3
Importance: High

Ms. Howell,

Attached is a memo with responses to USEPA comments, the signed GWMP, and the signed QAPP.

Two additional emails will follow containing attachments for the QAPP and GWMP.
Thank you!

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