From: Howell, Tonya
To: Meyer, Lisa A
Cc: Miller, Barbara J
Subject: RE: Ameren Huster Substation QAPP
Date: Wednesday, September 21, 2022 10:00:00 AM

EPA has completed a review of the "Quality Assurance Project Plan, Ameren Missouri Huster Substation, Findett/Hayford Bridge OU4, St. Charles, Missouri" prepared by Ameren Missouri dated 07/09/2022 has been completed according to "EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations," EPA QA/R-5 March 2001.

Critical comments identify issues which need to be addressed before the document can be approved. General comments identify opportunities for strengthening the document but do not affect approval. When the revised QAPP is resubmitted, it will be reviewed in conjunction with the GMP and the DPT work plan to ensure that all necessary information is included within these documents.

Critical Comments

1. Quality Assurance Project Plan, page 5. This section states significant deviations or modifications performed outside of the QAPP will be documented in field notes and reports. However, such significant deviations and modifications would need EPA approval before they are implemented and this needs to be clearly stated in the QAPP.

2. § 1.1 Project Description, page 5.

    a. This section needs to include historical background information and clearly define the purpose of the data to be generated under this QAPP. Currently, this section simply summarizes what is stipulated in the Record of Decision.

    b. The third bullet in this section mentions ongoing monitoring. If this QAPP is intended to cover ongoing monitoring, the QAPP needs to clearly state the time period for this ongoing monitoring. If the monitoring will span multiple years, the QAPP needs to also address the following:

        i. periodic review of this QAPP (preferably annually) to ensure it remains current
        ii. that QAPP approval is valid for the project period or five years, whichever is less
        iii. if the QAPP will continue to be used after the valid time period, it will need to be resubmitted to EPA for review and approval.

3. The QAPP should also include the planned DPT work.

4. § 1.2.4 Loureiro Engineering Associates, page 7. The responsibilities for and independence of the QA Manager from those responsible for generating the data need to be defined in the QAPP.

5. § 1.2.5 TekLab, Inc. (TLI), page 8. This section refers to Missouri accreditation for this

laboratory. The referenced certification appears to only include accreditation in drinking water for inorganics whereas the main contaminants of concern for this project are VOCs. If it has been determined the Missouri accreditation held by the laboratory is acceptable for this project, this needs to be explained.

6. § 1.3.1 The Site, page 8.

    a. This section states "The Groundwater Monitoring Plan (GWP) for this Site contains sample collection process design details such as location, type and purpose of required samples, measurement parameters of interest, and a collection schedule." Because the GWP was not provided, none of the referenced information could be reviewed and verified making the QAPP incomplete.

    b. Designated groundwater wells will be sampled in and around the site; however, the QAPP does not identify which wells have been designated for sampling. If this information is found in the GWP, it could not be reviewed and verified at the time of the review because the GWP was not provided.

7. Table 2, page 8. MCLs are listed in Table 2 but the QAPP does not address the achievable laboratory detection and/or reporting limits to verify they are sensitive enough to meet the MCLs for the contaminants of concern.

8. § 1.4.1 Overview, page 9. Accuracy, representativeness, and comparability are defined here but the QAPP does not detail what actions are being taken to address these data quality indicators specific to this project including how they will be measured and/or evaluated.

9. § 1.5.3 Corrective Action, page 10. What action may be taken if field duplicates fail the criteria of 40%? Currently, the QAPP simply states the higher value will be used regardless of the results making it unclear how the RPD results from field duplicates will be used.

10. § 1.8.3 Corrective Actions, page 15. How will the results of the LEA Project Manager and AMO Project Manager review and resolution of deviations be shared with all data users?

11. Missing QAPP Elements. Although Table 1 refers to G-5 as a quality program document the QAPP was prepared in accordance with, the following QAPP elements were missing, and no equivalent information could be found:

    a. Distribution List
    b. Instrument/Equipment Testing, Inspection and Maintenance Requirements
    c. Instrument Calibration and Frequency
    d. Data Acquisition Requirements for Non-direct Measurements
    e. Reports to Management

    It is recognized that not every QAPP element will apply to every project, or an element may be addressed in a separate document. If an element does not apply, the QAPP needs to clearly state this. If an element is addressed in a separate document, the QAPP needs to provide a complete reference to where the information can be found.

General Comments

12. § 1.1 Project Description, page 5. Any special personnel or equipment requirements should be noted in this section of a QAPP.

13. § 1.5 Quality Control Objectives, page 9. This section of a QAPP should address procedures used to calculate QC statistics. For example, SOP 1005 in Appendix A appears to include the equation for RPD.

14. § 1.6 Sample Collection, Preservation, and Hold Time.

    a. This section should address equipment needed and decontamination of sampling equipment. Because this information appears to be covered by attached SOPs, it would be helpful if the QAPP references the applicable SOPs.

    b. Most laboratories have analytical SOPs or other similar documentation describing how they implement the base methods, and it would be useful if the QAPP included references to these laboratory SOPs or documentation.

    c. When addressing analytical methods, the QAPP should include who will be responsible for corrective actions in the laboratory and the needed laboratory turnaround time for the analyses, especially if it is important to the project schedule.

15. Table 4, page 12. Please note there appears to be an updated version of EPA 540-R-014-013 (see USEPA 540-R-20-005 November 2020).

16. Table 5, page 14. The contract with TLI is referenced for the contents of Level 4 data packages. Are the contents of the Level 2 data packages also found in the contract?

17. Table 6, page 15. Please note that G-9 has been separated into two documents and should now be referenced as G-9R and G-9S.

18. § 1.10 Data Management and Records, page 16. Any required computer hardware and software requirements to process, compile, and analyze data should be summarized here.

19. § 1.11 QA/QC Audits, page 16. This section of a QAPP should not only address field audits, but laboratory audits as well.

20. Laboratory References. Reference to laboratory procedures and other documentation could not be verified at the time of the review.

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From: Meyer, Lisa A <LMeyer2@ameren.com>
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Subject: Ameren Huster Substation QAPP

Tonya,

Attached is the revised (July 9, 2022) and signed Huster Substation QAPP for review/approval.
Thanks,

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