From:	Howell, Tonya
To:	Meyer, Lisa A
Cc:	Miller, Barbara J
Subject:	RE: Ameren XFMR #1 Replacement - Soil Management Plan
Date:	Monday, October 31, 2022 12:30:00 PM
Attachments:	Huster XFMR 1 Soil Management Plan_09-27-22_TH.pdf

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It's EPA's understanding that this plan is going to undergo significant revisions, but per our conversation, attached are my comments on the plan as previously submitted.

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: Tuesday, September 27, 2022 10:14 AM
To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Miller, Barbara J <BMiller2@ameren.com>; Sperry, Clint <Sperry.Clint@epa.gov>; Meyer, Lisa A <LMeyer2@ameren.com>; Schuette, Daniel R <DSchuette@ameren.com>
Subject: RE: Ameren XFMR #1 Replacement - Soil Management Plan
Importance: High

Tonya,

I hope all went ok with your father's procedure last Friday.

Attached is the most current revision of the Huster Soil Management Plan for Transformer #1 Replacement based on comments below. As we discussed, this project is critical path so it will start as soon as all approvals have been received.

I will work in updating the Levee improvement soil management plan based on this feedback below as well. That document should be coming your way soon.

And I'll work on revisions to the Huster GMP, QAPP, and DPT plan per our previous conversation.

Thanks!
Lisa

From: Howell, Tonya <Howell.Tonya@epa.gov>
Sent: Wednesday, September 21, 2022 12:23 PM
To: Meyer, Lisa A <LMeyer2@ameren.com>
Cc: Miller, Barbara J <BMiller2@ameren.com>
Subject: [EXTERNAL] RE: Ameren XFMR #1 Replacement - Soil Management Plan

EXTERNAL SENDER **STOP.THINK.QUESTION.**
Verify unexpected requests before opening links or attachments.

Lisa, slight change of plans on my side. I went ahead and took another look at the two soil management plans today so that I could give you some more general feedback to start revisions. I still need to receive feedback on the documents from the state and I may have some additional comments when you resubmit the documents, but I think the comments being provided via this email will get these documents a lot closer to what we need on our end to approve them. The comments below and attached apply to both of the soil management plans, although I am just attaching the transformer replacement plan with comments inserted directly into the pdf file.

As we discussed on the phone today, the below template is being provided to help ensure all necessary information is included in the SMPs, as well as help with the document organization. I'm also providing a link to an example Soil Management Plan for another site: https://semspub.epa.gov/work/05/965746.pdf
Your SMP does not need to be as extensive or check all the boxes as the example provided, but hopefully you will find it helpful.

A lot of this information is already included, but make sure the following items are covered:

1. Introduction – Why are we writing the SMP
2. Description of the replacement/ redevelopment actions taken that warrant soil excavation
3. Purpose of the SMP
4. Description of property use limitations (including this SMP) related to the remediation and residual contaminants
5. Location, depth of the affected soil and estimated volume of soil to be excavated (*Include description and figures)*
6. Conditions or activities covered by the SMP
7. Sampling and analysis procedures
8. Procedures for materials management during those activities
9. Waste Management / disposal plan
10. Site Self-Inspection and Reporting requirements
11. Emergency response plans/procedures / # of contact persons etc

I also followed up with MoDNR regarding disposal of excavated onsite soils per our conversation earlier this week and got a slightly different answer than I received when I spoke

with them on Monday. It appears as if this information is no longer relevant for the two soil management plans that are currently being drafted/reviewed, but I still want to provide it to you for future reference. Text in italics is from MoDNR:

Regarding your question about reuse of soils:

1. *The following choices are available when affected soil is excavated* ***from the areas and depths to be excavated as described in the report****:*
    a. *Replace the soil at its original location and depth; OR*
    b. *Dispose of the soil offsite (i.e. in a permitted landfill) as a waste; OR*
    c. *Stockpile and test the soil to determine its COC content and evaluate using currently available standards.*
2. *Affected soil from the source area(s) may not be removed from the site and used as Clean Fill on other sites without testing to verify that it meets Clean Fill requirements. Soil that meets MDNR standards for "clean fill" may be used as clean fill on- or off-site. No soils excavated from this site [or particular areas as specified] shall be considered "clean fill" for offsite use without prior testing and confirmation.*
3. *If soil is to be disposed of in a landfill, applicable permits such as a Special Waste Permit must be obtained from a the landfill prior to removal of excavated soils from the site.*
4. *Soils exceeding non-residential target levels* ***must be replaced at its original location and depth, or disposed of in a permitted landfill****.*
5. *Unless ALL affected soil is completely remediated/removed during your project, any engineered controls must be replaced to original spec.*

Tonya Howell
Remedial Project Manager / Superfund Redevelopment Coordinator
Superfund and Emergency Management Division
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913-551-7589

From: Meyer, Lisa A <LMeyer2@ameren.com>
Sent: Monday, September 19, 2022 5:37 PM

To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Sperry, Clint <Sperry.Clint@epa.gov>; Miller, Barbara J <BMiller2@ameren.com>; Schuette, Daniel R <DSchuette@ameren.com>; Derek D. Ingram <ddingram@loureiro.com>; Meyer, Lisa A <LMeyer2@ameren.com>
Subject: RE: Ameren XFMR #1 Replacement - Soil Management Plan
Importance: High

Tonya,

Per our last phone call, I've modified the transformer #1 replacement soil management plant to address the following concerns:

1. Risk Information per Section 2.0 – I've included the USEPA approved Huster HHRA by Haley Aldrich as an appendix item.
2. Backfill – I've updated the plan to clarify that **no** excavated material from Huster for this project will be used as backfill. All excavated material from Huster will be disposed of off-site.
3. Project Scope – I've included project scope information in section 1.0, as well as project drawing as an appendix item.

Please let me know if these changes addressed your comments from today.

Lisa

From: Meyer, Lisa A
Sent: Monday, September 19, 2022 11:55 AM
To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Sperry, Clint <Sperry.Clint@epa.gov>; Miller, Barbara J <BMiller2@ameren.com>; Schuette, Daniel R <DSchuette@ameren.com>; Derek D. Ingram <ddingram@loureiro.com>
Subject: RE: Ameren XFMR #1 Replacement - Soil Management Plan
Importance: High

Tonya – per our phone call this morning, here's the transformer soil management plan for your review. **Please review and respond by 9/23/22**. We have also submitted this and other plan to the City of St. Charles. We are still awaiting a response from them.

As a side note, there is oil on the gravel and concrete pads below this transformer which we've sampled and sent for PCB analysis. I should have results on Wed which will determine how to properly dispose of this surface layer.

Lisa

From: Meyer, Lisa A
Sent: Friday, August 26, 2022 7:27 AM
To: Howell, Tonya <Howell.Tonya@epa.gov>
Cc: Sperry, Clint <Sperry.Clint@epa.gov>; Meyer, Lisa A <LMeyer2@ameren.com>; Miller, Barbara J <BMiller2@ameren.com>; Schuette, Daniel R <DSchuette@ameren.com>; Derek D. Ingram

<ddingram@loureiro.com>
Subject: Ameren XFMR #1 Replacement - Soil Management Plan

Good morning Tonya,

Our Ameren engineering group will be replacing transformer #1 at Huster Substation this fall. The work is expected to begin mid-September and wrap up by December 1. Since this work is within the substation and near the area of known VOC contamination, we have created a soil management plan for your review. The group is also hiring Loureiro to manage (collect, treat via the GETS system, and discharge) groundwater that has to be pumped from the ground during this work.

The engineering group will also provide this and other project documents with the City of St. Charles.

Please review and let me know if additional information needed by the USEPA for this upcoming work.
Thanks,

LISA A. MEYER
Consulting Engineer, Environmental Services
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