

US EPA ARCHIVE DOCUMENT

## ATTACHMENT A

### Statement of Work For Surface Water Monitoring and Cap Maintenance Rotary Drilling Supply, Inc. Crystal City, Missouri

The purpose of this Statement of Work (SOW) is to define the requirements, standards and guidelines that shall be incorporated into the terms of the Work Plan required by Paragraph 50 of EPA's Administrative Order on Consent, Docket Number RCRA-07-2012-0028 and followed by the Respondents to accomplish the following tasks:

1. Prepare and implement a Surface Water Monitoring Plan
2. Prepare and implement a Cap Maintenance Plan

**Task I:** Prepare and implement a Surface Water Monitoring Plan to monitor for releases to the surface waters near the Site. The purpose of the plan is to monitor for coal combustion residual (CCR) constituents in surface waters near the site.

At a minimum, the Surface Water Monitoring Plan shall satisfy the following criteria:

- A. Provide a map showing the location of surface water bodies near the Site that could potentially be impacted by seeps and runoff from the Site.
- B. Quality Assurance Project Plan (QAPP). To ensure that all information, data, and resulting decisions are technically sound, statistically valid, and properly documented, the Respondents shall prepare a QAPP to document all monitoring procedures, sampling, field measurements and sample analysis performed during the investigation and monitoring of the Site. The Respondents shall use quality assurance, quality control, and chain-of-custody procedures approved by the EPA. The QAPP should be prepared in accordance with the EPA *Requirements for Quality Assurance Project Plans*, EPA QA/R-5, EPA/240/B-01/003, March 2001, and following EPA *Guidance for Preparing Quality Assurance Project Plans*, EPA QA/G-5, EPA/240/R-02/009, December 2002. The minimum elements of the quality assurance program for data collection activities are in Chapter One of EPA publication SW-846, entitled *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*. The QAPP shall include a description and qualifications of all personnel performing or directing Site monitoring and sampling, including contractor personnel. Standard operating procedures (SOPs) shall be included as an attachment to the plan(s) if SOPs are cited in the text.
- D. Sampling and Analysis Plan (SAP). The SAP shall outline the field investigation activities which will be conducted to determine the nature and extent of surface water

contamination associated with the Site. The SAP shall be prepared in accordance with EPA *Guidance on Choosing a Sampling Design for Environmental Data Collection*, EPA QA/G-5S, EPA/240/R-02/005, December 2002. At a minimum, the SAP shall include the following:

1. A description of the Site, and its status;
2. Clearly stated objectives for the specific sampling event, including the ultimate goal and/or use of the sampling data and the techniques which will ensure that the samples will provide the required data;
3. A description of the sampling approach/rationale for defining the nature and extent of contamination; and
4. A description of sampling procedures which shall include: sampling locations, sample collection procedure, field quality assurance samples, analyses to be conducted including analytical method numbers, sample containers, sample preservation and shipment, and chain-of-custody procedures.

**Task II:** Prepare and implement a Cap Maintenance Plan (CMP). Respondents shall prepare and submit a CMP for the Site that includes but is not limited to cap repair and maintenance; details of site inspections including schedule; and annual surface water sampling and analysis.

In accomplishing the above tasks, the Respondents shall comply with the provisions of the Administrative Order on Consent (AOC), Docket Number RCRA-07-2012-0028, this SOW, and any applicable EPA guidance.

In addition, the CMP shall describe all normal operation and maintenance procedures including:

- (1) A description of tasks for inspection and maintenance of the cap; and
- (2) A schedule showing the frequency of each O & M task including, but not limited to annual surface sampling, cap inspections, and cap mowing.

The CMP shall state that all surface samples will be collected in accordance with the EPA-approved SAP and QAPP for the Site.

The CMP shall describe any solid wastes which may be generated by the operation of the remedy and describe how they will be managed.

The CMP shall describe, as applicable, contingency procedures necessary to ensure operation in a manner protective of human health and the environment.