

COUNCIL ACTION FORM

SUBJECT: CONSULTING ENGINEERING SERVICES FOR COMPLIANCE WITH THE GROUNDWATER MONITORING PROVISIONS OF U.S. EPA'S COAL COMBUSTION RESIDUALS (CCR) STANDARD

BACKGROUND:

On April 17, 2015, the Final Rule entitled "Hazardous and Solid Waste Management System; Disposal of Coal Combustion Residuals From Electric Utilities" was published in the *Federal Register*, which regulated the disposal of ash in surface impoundments and landfills from the burning of coal in electric utility boilers. Subsequent to that action, there have been two significant amendments to the final rule, where in the first case EPA corrected a key compliance date, and in the second case EPA extended the original compliance deadlines for certain CCR Standard requirements by 547 days.

As of October 19, 2015, the City took action to prevent coal combustion residuals (CCR) or coal ash from being disposed of in the City of Ames Steam Electric Plant's surface impoundment so that it qualified as an "inactive CCR surface impoundment." (Between October 19, 2015, and April 23, 2016, coal ash was captured and disposed of at the Boone County landfill.) As of April 23, 2016, the power plant no longer burned coal so CCR was not produced and the inactive status of the surface impoundment was maintained.

On December 19, 2017, SCS Engineers of Clive, Iowa, was awarded a purchase order to complete eight (8) studies/reports necessary to meet a CCR compliance deadline of April 17, 2018. Additionally, they were to complete an analysis of the need for an Emergency Action Plan (EAP) for the site by October 16, 2018. For this scope of work the City had issued a request for proposals (RFP) that resulted in the City receiving nine (9) proposals ranging in price from \$30,710 to \$124,350, with an average price of \$76,555.33. SCS Engineers had the low priced proposal of \$30,710, and performed the scope of work on time and very well.

The next set of requirements to comply with the CCR Standard requires the establishment of a very comprehensive and laborious groundwater monitoring program. This program must include the following:

1. The installation of a groundwater monitoring system
2. The development of a groundwater sampling and analysis program to include the selection of a statistical procedures to evaluate groundwater monitoring data

3. Initiate a detection monitoring program to include obtaining eight (8) independent rounds of samples from each background and downgradient well
4. Evaluate the groundwater monitoring data for statistically significant increases over background levels for seven (7) different constituents
5. The preparation of an annual groundwater monitoring and corrective action report

Items 1. through 4. have a compliance date of April 17, 2019. Item 5. has a compliance date of August 1, 2019.

SCS Engineers submitted a proposal dated April 30, 2018, in which they in describe in detail the scope of work they would perform for the City to comply with the groundwater monitoring program requirements of the CCR Standard. **The total price for the scope of work is estimated at \$122,780.** In general, the field work, and the sampling and analyses of samples will be unit cost based, while the required reports will be lump sum based.

Based upon their low priced proposal for the previous and just completed CCR work, and on the performance and quality of that work, and because it would be desirable to have continuity with this related scope of work, City staff recommends SCS Engineers of Clive, Iowa, be awarded the above listed scope of work for the estimated total price of \$122,780.

Funding for this work will come from the Council-approved FY 17/18 CIP project titled Ash Pond Modifications.

ALTERNATIVES:

1. Approve a Change Order with SCS Engineers of Clive, Iowa, in the amount of \$122,780 to develop, install, monitor, and report on a groundwater monitoring system and program for the City of Ames Steam Electric Plant's "inactive" coal combustion residuals CCR surface impoundment to comply with U.S. EPA's CCR Standard.
2. Reject proposal and delay the development and installation of the groundwater monitoring program necessary for the City of Ames Steam Electric Plant to comply with U.S. EPA's CCR Standard.

MANAGER'S RECOMMENDED ACTION:

This scope of work, the development and installation of a groundwater monitoring system and program, is necessary for the City of Ames Steam Electric Plant to comply with U.S. EPA's CCR Standard. Therefore, it is the recommendation of the City Manager that the City Council adopt Alternative No. 1 as stated above.