

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: PST Reimbursement Section- Standard Operating Procedures File **Date:** July 19, 2004

From: Frederick Meyers, Manager, PST Reimbursement Section

Subject: Review and Reimbursement of Groundwater Monitoring Activities

Objective: To establish a uniform evaluation for reimbursing the costs associated with Groundwater Monitoring (GWM) activities conducted at leaking petroleum storage tank (LPST) sites.

Background: The review process involves: the comparison of the actual work performed with the scope preapproved; noting the differences; and, adjusting the total reimbursable amount accordingly. Scope changes are a common occurrence with this activity and tend to include the following:

- changes in the number of sampling events, number of wells sampled and amounts of waste disposal
- monitor wells gauged, but not sampled
- monitor wells not sampled because of the presence of PSH

REIMBURSEMENT POLICY:

CASE 1: For changes that occur in regard to the number of events, wells sampled and/or amount of waste disposal, the review/reimbursement process is as follows:

1. Enter the scope of work documented in the Groundwater Monitoring report into the GWM QuattroPro spreadsheet by:

- Using the Chain-of-Custody documentation to determine the number of wells sampled during each event.
- Determining the average depth to water for the entirety of the cycle by using the gauging table.
- Noting the exact amount of water disposed, in gallons, by using transport and disposal receipts. Enter this amount directly into the detailed spreadsheet. Take this amount and divide it by 55. This will calculate the number of drums needed for storage. Round up to the nearest whole number and input this number under Part B of the spreadsheet under "Drums". Check to see if the drums were purchased or were provided out of consultant stock. If purchased, put the purchase price (from the subcontractor invoice not to exceed \$40.00/drum) into the line entitled "Total subcontracted equipment costs".
- Verifying that the consultant did the sampling or if this task was subcontracted. For travel distance, use the distance from the consultant's nearest office or subcontractor's office, whichever is smaller.

2. If the sampling was subcontracted, place the total cost of the subcontracted costs in the "Personnel" section of the detailed spreadsheet under "Total subcontracted personnel costs". This will apply the 10% mark-up only to the actual subcontracted costs.

3. Apply mark-up to the remaining subcontracted costs.

CASE 2: For changes that occur in regard to the monitor wells gauged, but not sampled, the review process is as follows:

1. Verify that wells were gauged, but not sampled by comparing the sampling schedule by event with the results of the gauging table. If a well is noted as “Dry” in this table, count it as a well that has been gauged but not sampled.
2. Take the total number of wells gauged but not sampled (all events) and go to “Part B:Equipment Costs” if the consultant did the work, or “Part D: Analytical Costs” if the sampling work was subcontracted, of the detailed spreadsheet. This is to keep the mark-ups, if appropriate, in line with the RCGs.
3. Replace the first “other” line in either Part B or Part D with “Wells gauged not sampled”. Under “Hours or Units” place the total number from above. Under “Rate (\$/units) put \$10.00.

NOTE: Do not include wells containing PSH in this Step if the site is under a PSH Recovery CARF.

CASE 3: For changes that occur in regard to monitor wells not sampled because of the presence of PSH, the review process is as follows:

1. Verify that there are gauged wells containing more than .1' of PSH. If this is the case, the consultant or individual doing the field work has the *option* of recovering PSH from such a well *if it is the first time the PSH has been noted or if the PSH is of an ephemeral nature*. Normal protocol, when discovering PSH in a well, is to submit a workplan/cost proposal for PSH recovery after the first encounter (per the RCGs). If this is the case, replace the second “other” line under either Part B or Part D with “Wells w/ PSH recovered”. Under “Hours or Units” place the appropriate number. Under “Rate (\$/units)” put \$30.00. (This will allow a total of \$40.00 for each such case- \$10.00 for gauging and \$30.00 for PSH recovery.)
2. Under “Disposable Bailers” in Part B, add one for each well in which PSH was recovered. All PSH recovery of this nature must be documented in the GWM Report. A separate table should be included containing the well number, date, depth-to-water, depth-to-product, PSH thickness, fluids/PSH recovered, and total PSH recovered over time. If this documentation is not in the report, add the numbers to the spreadsheet but hold these specific costs (time and bailers) for the data (Code 95).

NOTE: This process does not apply if the site is under a PSH Recovery CARF. Newly impacted wells with PSH should be covered in an adjustment of the costs under that phase of work.

EFFECTIVE DATE OF IMPLEMENTATION:

This Standard Operating Procedure (SOP) replaces the one dated September 12, 2001.

