

Texas Commission on Environmental Quality

INTEROFFICE MEMORANDUM

To: PST Reimbursement Section- Standard Operating Procedures File **Date:** July 09, 2004

From: Frederick Meyers, Manager, PST Reimbursement Section

Subject: Review and Reimbursement of Remediation System Installations

Objective: To institute documentation requirements necessary for the technical and financial review of remediation system installation (SI) applications; and, to standardize the treatment of SI applications.

Background: SI reimbursement applications are subject to both a technical and financial review process. The technical component involves the review of performance parameters established in the Corrective Action Plan (CAP). These parameters include but are not limited to system measurements obtained during the seven-day system start-up such as air/vapor flow and groundwater pumping rates, well vacuum, water table gauging, as-builts to scale and system performance laboratory analyses. Although reimbursability for this preapproved work is not strictly based upon system performance, the newly installed remediation system must conform to CAP design specifications, and the completed work must be technically justifiable and should serve to advance the site in the corrective action process. This data must be included in the corresponding technical report and be submitted with the claim for associated costs to be considered for reimbursement.

The financial component involves the review of SI and seven-day start-up costs. Submitted costs for reimbursement will be evaluated against pre-approved and/or actual costs. Installed system components will be evaluated against the pre-approved capital equipment bid as required by the Reimbursable Cost Guidelines, Activity 09: Remediation System Installation.¹ Individual capital equipment pieces must be itemized with make and model number on all capital equipment invoices along with quantity and unit pricing denoted for each piece. All SI capital equipment invoices must contain said component breakdown to be considered for reimbursement.² Lump sum invoices will be withheld for breakdown of individual capital equipment descriptions and costs. Additionally, unique identification numbers or serial numbers for major capital equipment components such as SVE blowers, liquid ring pumps, air strippers, catalytic oxidizers and thermal oxidizers must be provided with the reimbursement claim in order to be considered for reimbursement.

REIMBURSEMENT POLICY:

The following Technical and Financial documentation must be included in SI reimbursement claims in order for associated costs to be considered eligible for reimbursement.

Technical:

1. seven-day start-up data

- air/vapor flow and groundwater pumping rates
 - well vacuum measurements
 - water table gauging
2. System performance laboratory analyses data
 - influent and effluent vapor phase sampling and analyses
 - influent and effluent dissolved phase sampling and analyses
 - field parameter sampling and analyses (if directed and preapproved)
 3. System schematics
 - as-builts (sealed by a licensed engineer and to scale)
 - equipment schedule (equipment list)
 4. Photographic documentation
 5. Supporting Documentation
 - chain of custody for associated samples
 - waste manifests for associated disposed wastes

Missing or deficient technical documentation and/or data are grounds for withholding the entire requested application amounts pending the submittal and review of the missing information.

Financial:

6. All associated requirements per §334.306 titled “Form and Contents of Application”
7. Individual capital equipment descriptions and costs on the submitted invoice
 - make and model number
 - quantity of each capital equipment piece
 - unit pricing of each capital equipment piece
8. Serial number or unique identification number for:
 - oxidizers
 - soil vapor extraction blowers
 - liquid ring pumps
 - air strippers
 - any other pre-approved emissions control device

Missing or deficient financial documentation, detailed invoice breakdown, or detailed component description are grounds for withholding the corresponding invoice amount plus any associated mark-up pending the submittal and review of the missing information.

If, during the course of technical and financial review it is found that additional information is required to evaluate the application, the insufficiently documented costs will be withheld pending the submittal and review of the requested information.³

EFFECTIVE DATE OF IMPLEMENTATION:

This Standard Operating Procedure (SOP) will be effective for all active protests, claims, and currently pre-approved O&M work at the date of this SOP.

References:

1. §334.560 Subchapter M
2. §334.306 Subchapter H
3. §334.313 Subchapter H

System InstallIOM 7-19-04.wpd