



City of Grand Island

Tuesday, March 10, 2020

Council Session

Item G-2

**#2020-54 - Approving Platte Generating Station Coal Combustion
Residual Groundwater Services Assessment of Corrective
Measures - Task 10-300 and Task 13 with HDR Engineering**

Staff Contact: Tim Luchsinger, Stacy Nonhof

Council Agenda Memo

From: Timothy G. Luchsinger, Utilities Director
Stacy Nonhof, Interim City Attorney

Meeting: March 10, 2020

Subject: PGS- Coal Combustion Residual (CCR) Groundwater Services

Presenter(s): Timothy G. Luchsinger, Utilities Director

Background

On April 17, 2015, the U.S. Environmental Protection Agency (EPA) published the final rule for the regulation and management of Coal Combustion Residual (CCR) under the Resource Conservation and Recovery Act (RCRA). The rule became effective on October 19, 2015. In general, CCR compliance activities include publication of public information on the web, signage, groundwater sampling, and impoundment structural and safety assessment is required for the Platte Generating Station.

Platte Generating Station personnel reviewed the regulations and determined consulting services were needed to meet the CCR Rule compliance schedule. HDR Engineering was hired as the sole source to ensure timeliness, high quality and consistency among other electric utilities and independent power producers in Nebraska.

Discussion

On September 27, 2016 Council Approved HDR Engineering to complete Tasks 1-4 to include ground water sampling, review of the Ash land fill closure plan, Post-closure plan, and Run on/run off control system plan for a cost not to exceed \$86,290.00.

On September 24, 2019, Council approved HDR Engineering to complete Tasks 5-9 to include groundwater sampling, fugitive dust control, alternative source demonstration (ASD) investigation, statistical analysis reporting, and preparation of a conceptual site model of the hydrologic and hydro-geochemical setting of the PGS Ash Landfill including evaluation of the results of the model for a cost not to exceed \$189,960.00.

On October 8, 2019, Council approved HDR Engineering to complete Task 10 to include preparation for the Title 132 Permit Renewal Application and amend the CCR Run-On and Run-Off Control System Plan for a cost not to exceed \$39,970.00.

On October 8, 2019, Task 11 was presented for the CCR 2019 Annual Landfill Inspection and Fugitive Dust Control Reporting for a cost not to exceed \$12,990.00.

On November 26, 2019, Council approved HDR Engineering to complete Task 12 to meet the next phase of the CCR Rule for finalizing the Assessment of Corrective Measures (ACM) and update the CCR Groundwater Certifications including the upgradient well MW-10, Task 12 for a cost not to exceed \$16,600.00.

The Nebraska Department of Environment and Energy (NDEE) began requesting ash disposal areas to incorporate the CCR Rule plans into their permit renewal and other plans, such as the Groundwater Sampling and Analysis Plan. Recent communication with NDEE has resulted in more requests for even further information, clarifications, descriptions and meetings requiring more services beyond the initial allowance. With the Federal CCR Rule, the NDEE is closely scrutinizing ash disposal areas permit renewals and trying to incorporate the CCR Rule impact into their regulatory understanding.

To ensure continued preparation and to address and respond to NDEE regarding the Title 132 Permit Renewal Application revisions and amend the CCR Run-On and Run-Off Control System, Task 10-300 is being presented and amended for a cost not to exceed \$14,860.00.

Task 13 is being presented for the CCR Groundwater Monitoring and Reporting, including semi-annual Groundwater Sampling for the first and second half of 2020, and the 2020 Spring and Fall Groundwater Reports. Task 13 is being presented for a cost not to exceed \$47,100.00.

To ensure the same high quality and consistency for these next phases of the CCR Rule 257.95(g) and NDEE Title 132, it is recommended that HDR Engineering continue with these tasks. HDR is providing state-wide consistency across the state of Nebraska with the NDEE.

In accordance with City procurement code, plant staff recommends that the Council authorize HDR Engineering continue their services as the Consulting Engineer for the Platte Generating Station CCR requirements.

Alternatives

It appears that the Council has the following alternatives concerning the issue at hand. The Council may:

1. Move to approve
2. Refer the issue to a Committee
3. Postpone the issue to future date
4. Take no action on the issue

Recommendation

City Administration recommends that the Council authorize HDR, Inc., of Omaha, Nebraska, to provide Engineering services to meet the Coal Combustion Residuals Program CCR Groundwater Field Sampling and 2020 Annual Reporting for Platte Generating Station for a fee not to exceed \$47,100.00, and Title 132 Permit Renewal revisions for an additional fee not to exceed \$14,860.00.

Sample Motion

Move to authorize HDR, Inc., of Omaha, Nebraska to provide Engineering Services for the Platte Generating Station 2020 CCR Groundwater Field Sampling and annual reporting requirements for a fee not to exceed \$47,100.00, and Title 132 Permit Renewal revisions not to exceed \$14,860.00.

AMENDMENT NO. 1 to
TASK ORDER 10 – PGS Ash Landfill Title 132 Permit Renewal

Amendment No. 1 to Agreement, City Purchase Order GIUD-435499

This Amendment No. 1 to Task Order 10 includes the Additional Services to address and respond to NDEE comments, and such efforts will exceed the Task 10-300 allowance of \$5000 for NDEE Commenting (PO Line 3 on the City's Firm Purchase Order). The services provided in this Amendment are based on the initial comments, communications and meeting with NDEE, and the official NDEE comments dated February 6, 2020. This Amendment shall be governed by the Agreement.

PART 2.0 SCOPE OF SERVICES TO BE PERFORMED BY ENGINEER ON THE PROJECT:

Task 10-300 – Respond to NDEE Comments

The activities completed and to be completed in responding to NDEE comments on the PGS Ash Landfill Title 132 permit renewal application and providing permit revisions include:

- Communications via email and telephone with NDEE and the City on NDEE's preliminary comments and scheduling conference call meeting with all parties. Meeting with City on January 17, 2020 to discuss options and approaches for resolution with NDEE comments.
- Prepared for and conducted conference call meeting with NDEE and City (January 22, 2020). Completed the meeting minutes of the conference call meeting, including definitions and other clarifications for NDEE. The minutes provide a starting point for revised text and drawings of the Title 132 permit renewal. Submitted minutes to NDEE and the City.
- Review NDEE official comments letter dated February 6, 2020.
- Based on January 2020 meeting minutes and the NDEE comment letter, we anticipate the following areas of the permit will be revised:
 - Permit Renewal Application: Section 1.2 – clarify disposal capacity, Section 3.2 – update run-on and run-off control description, Section 4.6 – expand descriptions of salvage operations and storage stockpiles along with maximum storage stockpile, Section 4.9 – update surface water requirements to coordinate with revisions to run-off control. Other sections to review and coordinate with revisions include Section 4.13 Phase Development and 4.15 Sample Inspection Form.
 - Appendix A: Run-on/Run-off Control System Plan – update hydraulic calculations for North Detention Basin culvert, add calculations for pumping, develop further description of run-off controls, and prepare site figure showing locations of pump, piping, culverts and discharge area. Add description of run-off control and perimeter ditches for when elevations of ash make it necessary to start placing ash in sump area (contingency run-off plan).
 - Appendix C: Groundwater Sampling & Analysis Plan – update Section 5.4 to reflect lab reporting.
 - Appendix H: Permit Drawings – revise drawings, add stormwater drawing and renumber.
 - Title Sheet – update list of drawings.
 - Drawing 01C102 CCR Grading Plan - add notes, locations of pump/piping, gauge post, flow arrows, and cross-sections cuts through graded sump area.
 - New Drawing 01C103 showing PGS site, North Detention Basin, pump/piping locations, and flow direction.
 - Drawing 01C104 Closure Contours – show flow arrows on perimeter ditches and move capping details to this sheet.
 - Drawing 01C105 Cross-Sections – add two new cross-sections with CCR sump grading, 25-year/24-hour storm run-off collection level.

- If necessary, conduct a conference call meeting with NDEE and City after receipt and review of official comment letter to the Title 132 permit renewal application. This meeting will discuss any of the written comments still needing to be resolved or clarified with NDEE prior to completing final revisions to the permit documents.
- Provide drafts of revised permit pages, figure and drawings to City for review. Incorporate City's review comments and finalize.
- Prepare response letter and submit revised permit pages and drawings to NDEE.

During this same time period, Ms. Stacey Stricker with the NDEE provided a second round of comments on the Nature and Extent Report for the PGS Ash Landfill (received in email dated January 28, 2020). The comments mostly relate to desired wording and statements in specific locations of the report. HDR will respond and revise the Nature and Extent Report to address these comments. Efforts will include:

- Revising, compiling, printing and mailing an updated Nature and Extent Report to NDEE.
- Preparing a submittal letter that summarizes the responses to comments.

Task Deliverables:

- Conference call meeting minutes.
- Draft individual permit application pages and drawings that are affected by NDEE's comments transmitted electronically for City review.
- Response Letter to NDEE and final revised permit replacement pages and drawings (NDEE – 5 copies; City – 1 hard copy, 1 electronic copy).
- Revised Nature & Extent Report (NDEE – 1 hard copy; City – electronic copy).

Planned Meetings: One conference call meeting with NDEE and City in January 2020. An additional conference call meeting with NDEE is budgeted in the amended allowance to resolve potential issues with the official NDEE comments in February 2020.

Key Understandings:

1. From the discussions and meeting minutes of the January 22, 2020 conference call with NDEE and the City, NDEE will not further change the permit application beyond the revisions agreed to in the meeting minutes and the comment letter dated February 6, 2020. A copy of meeting minutes is attached.
2. No changes to the CCR Fugitive Dust Control Plan, Closure Plan, Post-Closure Plan, financial assurance cost estimates, CQA Plan and Appendices I through N.
3. Meeting minutes and drafts will be transmitted electronically. The individual changed pages and drawings will be transmitted electronically to the City for review.
4. Provide copies of only the revised pages and drawings to the Title 132 Permit Renewal Application for the PGS Ash Landfill.
5. Based on the preliminary comments, meeting with NDEE and comment letter, the allowance under this Task 10-300 is increased to \$19,860. If efforts to respond to NDEE comments do not utilize this entire amended allowance, fee will only be invoiced for the required services.
6. NDEE will not have any further comments on the revised Title 132 permit renewal or revised Nature & Extent Report. If NDEE does issue another round of comments on the revised submittals, HDR will respond to such comments upon City approval of additional services.
7. Public notice of the permit renewal may lead to NDEE holding a public hearing. If a public hearing is scheduled, HDR can attend and provide City assistance upon approval of additional services.

Task Schedule:

Amendment Approval	Upon execution
NDEE Review Comments	February 6, 2020
Responses Submittal	by March 11, 2020
NDEE Public Notice*	mid-March 2020

*Updated NDEE review timeline; timeline may vary from this anticipated schedule.

PART 5.0 PAYMENTS TO ENGINEER:

The following table was developed to show the adjustment in fee as a result of the changes to the Task Order 10 scope of services as described in this Amendment No. 1.

- The estimated adjustment to fee for the Additional Services provided under amended Task 10-300 is \$14,860.

Upon execution, this Amendment shall supplement the Firm Purchase Order GIUD-435499 as it pertains to the Task Order 10 for CCR Landfill Title 132 Permit Renewal for PGS.

Amended Total Task 10-300 Allowance	\$ 19,860
<u>Less, Original Task 10-300 Allowance</u>	<u>\$ 5,000</u>
Amendment No. 1 Fee Adjustment	\$ 14,860
 Original Contract Fee	 \$ 39,970
Amended Contract Fee (Amendment No. 1)	\$ 54,830

IN WITNESS WHEREOF, the parties hereto have executed this Agreement this _____ day of _____, 2020.

CITY OF GRAND ISLAND, NE

"OWNER"

BY: _____

NAME: _____

TITLE: _____

ADDRESS: _____

HDR ENGINEERING, INC.

"ENGINEER"

BY:  _____

NAME: Matthew B. Tondl

TITLE: Senior Vice President

ADDRESS: 1917 S. 67th Street
Omaha, NE 68106

TASK ORDER 13

This Task Order pertains to an Agreement by and between the City of Grand Island, NE (CITY), ("OWNER"), and HDR Engineering, Inc. (HDR), ("ENGINEER"), per the January 5, 2018 Master Services Agreement, ("the Agreement"). Engineer shall perform services on the project described below as provided herein and in the Agreement. This Task Order shall not be binding until it has been properly signed by both parties. Upon execution, this Task Order shall supplement the Agreement as it pertains to the project described below.

TASK ORDER NUMBER: 13

PROJECT NAME: CCR 2020 Groundwater Monitoring & Reporting

PART 1.0 PROJECT DESCRIPTION:

The intent of the Scope of Services is to conduct the 2020 annual groundwater sampling, statistical analysis, and reporting required by the Federal CCR Rule and the Nebraska Department of Environment and Energy (NDEE) Title 132 permit, for the Ash Landfill (CCR unit) at the Platte Generating Station (PGS). Statistically Significant Increases (SSIs) were detected for boron at MW-3 during verification sampling completed July 31, 2018. An Alternate Source Determination (ASD) evaluation was conducted for the published SSI (dated November 14, 2018) at which point an additional upgradient monitoring well (MW-10) and nine downgradient delineation wells (MW-11 through MW-19) were installed. The ASD evaluation, submitted in the 2018 annual report, confirmed the SSI for the PGS Ash Landfill based on the data available to date. As a result, the City initiated an assessment monitoring program, as required in the CCR Rule, for the PGS Ash Landfill within the 90-day period specified in 40 CFR §257.95. In accordance with 40 CFR §257.95(b), the PGS Ash Landfill monitoring network was analyzed for Appendix IV constituents on January 23, 2019. A subsequent sampling event was completed on April 24, 2019 as part of the spring 2019 semiannual sampling event in accordance with 40 CFR §257.95(d).

As a result of entering the assessment monitoring program, groundwater protection standards (GWPS) were established for all Appendix IV constituents. During the spring 2019 semiannual sampling event, a statistically significant level (SSL) above the GWPS for cobalt was detected in monitoring well MW-3. The City conducted an ASD (dated October 31, 2019) which included statistical re-analysis of BTVs with the inclusion of upgradient monitoring well MW-10 and analysis of stormwater samples from within the landfill. Results of the ASD evaluation indicated the cobalt concentrations at MW-3 are partially due to spatial variation of naturally existing concentrations, potential upgradient source, and natural cobalt bound to the soil matrix into the surrounding grassland area. Activities associated with corrective action measures and monitoring requirements of the CCR Rule and NDEE Title 132 in response to the detected SSL at MW-3 will continue under separate Task Order(s). In 2020, all wells in the CCR groundwater monitoring network and all delineation wells will be sampled semiannually, in accordance with the assessment monitoring program requirements (40 CFR §257.95).

The scope of services proposed herein continues HDR's groundwater monitoring and reporting program to complete the 2020 semiannual groundwater sampling, annual groundwater statistical analysis, and reporting required by the Federal CCR Rule and the NDEE Title 132 permit, for the PGS Ash Landfill. The groundwater reporting will follow the current CCR sampling and analysis plan and the certified well network. Our understanding of task objectives, activities, deliverables, key assumptions, and approaches that HDR will use to complete the work is described below.

PART 2.0 SCOPE OF SERVICES TO BE PERFORMED BY ENGINEER ON THE PROJECT:

Services to be performed by HDR will include the following activities:

Task 100 – Groundwater Field Sampling

1. HDR will conduct groundwater sampling for the analysis of CCR Rule Appendix III & Appendix IV constituents at the existing CCR Unit. Groundwater sampling will include two (2) separate sampling events (anticipated to occur in April 2020 and October 2020). During each sampling event, CCR network monitoring wells and delineation wells will be sampled for a total of: 19 monitoring wells, 2

duplicate samples, and 1 field blank sample. This will result in a total of 22 samples analyzed each semiannual sampling event. The spring sampling event is anticipated to take two (2) field personnel one (1) field day to complete and the fall sampling event is anticipated to take one (1) field personnel two (2) field days to complete, and will include the following activities:

- Contact City one to two weeks in advance to schedule the event, discuss site access and other matters that need to be addressed and coordinate with the laboratory for sample container delivery.
- Complete internal quality control review with field sampling team. Review will include list of supplies/equipment, Health and Safety Plan, the current Groundwater Sampling and Analysis Plan (SAP), and field procedures.
- Collect the sample bottles, coolers, and field equipment required. Set up rental for groundwater pump and water quality meter. Purchase necessary disposable tubing and sampling supplies. Review sample bottles and equipment to assure adequate materials are available for the sampling activities.
- At each well planned for monitoring, the protective casings, well caps, ID labels, and locks will be inspected for integrity. Deficiencies will be documented and reported to the City.
- Collection of static water level and bottom of well casing measurements from each of the monitoring wells being sampled.
- Field measurements of temperature, pH, specific conductivity, turbidity, dissolved oxygen, and oxidation-reduction potential will be collected during purging of each well. Purging and sampling data will be recorded using a groundwater sampling data form. The form will be completed for each well.
- All groundwater samples will be shipped to laboratory for analyses.
- The parameters to be included in the analyses are Appendix III (Detection Monitoring constituents) and Appendix IV (Assessment Monitoring constituents) of the federal CCR Rule at each monitoring well.
- Upon receipt of the lab data, HDR will review the data and update the facility's database of groundwater parameters analyzed during the sampling event.

Task Deliverables:

- None anticipated

Planned Meetings: None anticipated.

Key Understandings:

1. Groundwater sampling will be completed by HDR personnel with a current water well monitoring technician (WWMT) license.

Anticipated Task Schedule:

Anticipated Notice to Proceed
1st Sampling Event
2nd Sampling Event

March 25, 2020
April 15, 2020
October 15, 2020

Task 200 – 2020 Spring Reporting

Objective:

Evaluate groundwater monitoring data collected during the first 2020 semiannual sampling event in accordance with 40 CFR §257.96(b) to determine if the PGS Ash Landfill has additional statistically significant levels (SSLs) above the Groundwater Protection Standards (GWPS).

HDR Activities:

HDR will analyze the existing CCR monitoring well data collected as part of the Assessment Monitoring program and additional data collected during the first 2020 semiannual sampling event at the PGS Ash Landfill. Analysis of the data will include the following activities:

1. Upon receiving the laboratory analytical results for the spring 2020 semiannual Assessment Monitoring event, HDR will summarize the sampling event and perform statistical analysis of the groundwater data

in accordance with the facility's most recent Groundwater SAP and Statistical Method Certification for inclusion in:

- NDEE Title 132 Semiannual Groundwater Monitoring Report.
 - CCR Rule notification letter, if necessary, to be placed in the operating record and on the owner or operator's publicly accessible internet site. The notification letter will be developed, as required by the Federal CCR Rule, if a statistically significant level (SSL) above the groundwater protection standards (GWPS) is detected during the April 2020 sampling event for any Appendix IV constituents at the certified groundwater monitoring system for the PGS Ash Landfill. The CCR Rule requires an Annual Groundwater Monitoring & Corrective Action Report; therefore, a CCR report will not be completed for the spring 2020 sampling event. A technical memorandum with the results of the statistical analysis will be provided to the City and will be included in the Annual CCR Report.
2. HDR will complete a draft of the NDEE Title 132 Semiannual Groundwater Monitoring Report and provide to the City for review and comment. Comments will be incorporated into the report and final copy will be provided to the City for placement in their operating record (not to be posted to the facility's publicly accessible internet site). The Title 132 Semiannual Groundwater Monitoring Report must be submitted to NDEE (by HDR on behalf of the City; unless otherwise requested) no later than August 1, 2020.
 3. HDR will provide copies of notification letters required by the CCR Rule. Notification letters will be prepared in accordance with 40 CFR §257.106. Notifications may include, but are not limited to: notification identifying constituents in CCR Rule Appendix IV that were detected statistically above the GWPS; notification of an ASD evaluation; and notification to the NDEE of placement of information in the operating record and on the publicly accessible website.
 4. HDR will develop a groundwater contour map for the spring 2020 sampling event to be included in the Title 132 Semiannual Groundwater Monitoring Report. Groundwater contours will include groundwater flow direction and an estimated flow velocity.

Anticipated Meetings and Site Visits:

It is anticipated that one (1) conference call will be held with the City and HDR to discuss results of the spring 2020 groundwater sampling event, and comments on the draft Title 132 Semiannual Groundwater Monitoring Report.

Task Deliverables:

- Draft Title 132 Semiannual Groundwater Monitoring Report for the City to review, submitted electronically.
- Final Title 132 Semiannual Groundwater Monitoring Report (one (1) electronic copy to the City and one (1) paper copy to NDEE).
- Notification letter(s), if necessary, to be placed on City's letterhead (for placement in the facility's operating record and publicly accessible internet site).

Key Understandings and Assumptions:

1. Groundwater sampling will be completed by HDR personnel (see Task 100).
2. HDR will use the SANITAS™ software package, by Sanitas Technologies, Inc., to provide the statistical analysis. Software renewal fees will be required for 2020 and have been included in this Agreement.
3. The NDEE Title 132 Semiannual Groundwater Monitoring Report will be completed by HDR's qualified professional engineer for placement in the facility operating record. Report will be provided in electronic format to the City. HDR will submit the report to NDEE on behalf of the City (unless otherwise requested). HDR will submit the paper copy of the Report to NDEE no later than August 1, 2020.
4. In the event notification letter(s) are required by the federal CCR Rule to be posted to the operator's publicly accessible internet site, the draft notification letter will be provided in electronic format to the City. The City will place the notification on the City's letterhead prior to placement in operating record and posting.

5. Pending the results of the spring 2020 groundwater sampling event and statistical analysis, verification sampling and reporting may be required. This Task Order 13 does not include verification sampling. If necessary, an amendment to the scope and fee will be submitted to the City.
6. The scope of this work does not include an ASD or reporting requirements specified under the Corrective Action Monitoring Program in the Federal CCR Rule and the NDEE Title 132 program. In the event a formal ASD or Corrective Action Monitoring reporting is required, an amendment to the scope and fee will be provided to the City.

Task 300 – 2020 Fall Reporting

Objective:

Evaluate groundwater monitoring data collected during the second 2020 semiannual sampling event in accordance with 40 CFR §257.96(b) to determine if the PGS Ash Landfill has additional statistically significant levels (SSLs) above the Groundwater Protection Standards (GWPS).

HDR Activities:

HDR will analyze the existing CCR monitoring well data collected as part of the second 2020 semiannual sampling event at the PGS Ash Landfill. Analysis of the data will include the following activities:

1. Upon receiving the analytical results for the fall 2020 semiannual groundwater monitoring event, HDR will summarize the sampling event and perform statistical analysis of the groundwater data in accordance with the facility's most recent Groundwater SAP and Statistical Method Certification for inclusion in:
 - the Annual Groundwater Monitoring & Corrective Action Report, as required by the Federal CCR Rule; and the
 - NDEE Title 132 Semiannual Groundwater Monitoring Report.
2. HDR will complete a draft of the Annual Groundwater Monitoring & Corrective Action Report and provide to the City for review and comment. Comments will be incorporated into the report and final copy will be provided to the City for placement in the operating record and on the facility's publicly accessible internet site. The Annual Groundwater Monitoring & Corrective Action Report must be placed in the facility's operating record no later than January 31, 2021. The Annual Groundwater Monitoring & Corrective Action Report must be posted to the facility's publicly accessible internet site no later than 30 days after placement in the operating record (March 2, 2021; if placed in record on January 31, 2021).
3. HDR will complete a draft of the NDEE Title 132 Groundwater Monitoring Report and provide to the City for review and comment. Comments will be incorporated into the report and final electronic copy will be provided to the City. HDR will submit the report to NDEE on behalf of the City (unless otherwise requested). HDR will submit the paper copy of the Report to NDEE no later than February 1, 2021.
4. HDR will provide copies of notification letters required by the CCR Rule. Notification letters will be prepared in accordance with 40 CFR §257.106. Notifications may include, but are not limited to: notification identifying constituents in CCR Rule Appendix IV that were detected statistically above the GWPS, and notification to the State Director of placement of information in the operating record and on the public website.
5. HDR will develop a groundwater contour map for the fall 2020 sampling event to be included in the Title 132 Semiannual Groundwater Monitoring Report. Groundwater contours will include groundwater flow direction and an estimated flow velocity.
6. Pending the results of the fall 2020 groundwater sampling event and statistical analysis, verification sampling and reporting may be required. This Task Order 13 does not include verification sampling. If necessary, an amendment to the scope and fee will be submitted to the City.

Anticipated Meetings and Site Visits:

It is anticipated that one (1) conference call will be held with the City and HDR to discuss results of the fall 2020 groundwater sampling event, and the City's comments on the draft Title 132 Semiannual Groundwater Monitoring Report and the CCR Annual Groundwater Monitoring & Corrective Action Report.

Task Deliverables:

- Draft Title 132 Semiannual Groundwater Monitoring Report for the City's review, submitted electronically.
- Final Title 132 Semiannual Groundwater Monitoring Report (one (1) electronic copy to the City and one (1) paper copy to NDEE).
- Draft CCR Annual Groundwater Monitoring & Corrective Action Report for the City's review, submitted electronically.
- Final CCR Annual Groundwater Monitoring & Corrective Action Report (one (1) electronic copy to the City).
- Notification letter(s), if necessary, to be placed on City's letterhead (for placement in the facility's operating record and publicly accessible internet site).

Key Understandings and Assumptions:

1. Groundwater sampling will be completed by HDR personnel (see Task 100).
2. The NDEE Title 132 Semiannual Groundwater Monitoring Report will be completed by HDR's qualified professional engineer for placement in the facility operating record. Report will be provided in electronic format. HDR will submit the paper copy report to NDEE on behalf of the City (unless otherwise requested). HDR will submit the copy of the Report to NDEE no later than February 1, 2021.
3. In the event notification letter(s) are required by the federal CCR Rule to be posted to the operator's publicly accessible internet site, the draft notification letter will be provided in electronic format to the City. The City will place the notification on City's letterhead prior to placement in facility operating record and posting.
4. The Annual Groundwater Monitoring & Corrective Action Report will be completed by HDR's qualified professional engineer for placement in the facility operating record. The City will place in their operating record the final version of the Annual Groundwater Monitoring & Corrective Action Report no later than January 31, 2021.
5. The City will post the final version of the Annual Groundwater Monitoring & Corrective Action Report to the facility's publicly accessible internet site no later than 30 days after placement in the operating record.
6. This Task Order 13 does not include verification sampling following the fall 2020 sampling results. If necessary, an amendment to the scope and fee will be submitted to the City for verification sampling of groundwater.
7. The scope of this work does not include an ASD or reporting requirements specified under the Corrective Action Monitoring Program in the Federal CCR Rule and the NDEE Title 132 program. In the event a formal ASD or Corrective Action Monitoring reporting is required, an amendment to the scope and fee will be provided to the City.

PART 3.0 OWNER'S RESPONSIBILITIES:

1. City will provide access to the site related to the PGS Ash Landfill.
2. City will place reports and documents in the facility operating record.
3. City will post the 2020 Annual Groundwater Monitoring & Corrective Action Report on their CCR website within 30 days of placing report in the facility operating record (deadline for placement in operating record is January 31, 2021).

4. City will place draft notification on City letterhead, finalize, and sign and submit notification to NDEE that the 2020 Annual Groundwater Monitoring & Corrective Action Report was placed in operating record and posted to the CCR website.

PART 4.0 PERIODS OF SERVICE:

Services associated with this project will commence upon Notice to Proceed from the City of Grand Island. The schedule outlined below is proposed by HDR based on anticipated approval of this proposal by March 25, 2020.

CCR 2020 Groundwater Monitoring & Reporting	Start Date	End Date
Contract Award	March 2020	March 2020
Task 100 – Groundwater Sampling		
1 st Semi-Annual Groundwater Sampling Event (completed by HDR)	April 2020	April 2020
2nd Semi-Annual Groundwater Sampling Event (completed by HDR)	October 2020	October 2020
Task 200 - 2020 Spring Reporting		
Statistical Analysis & Draft Title 132 Groundwater Report to City	June 2020	June 2020
Final Title 132 Groundwater Report to NDEE	June 2020	June 2020
HDR to Submit to NDEE	No later than August 1, 2020	
Notification Letter(s), as necessary	TBD	TBD
Task 200 - Fall 2020 Reporting		
Statistical Analysis & Draft Title 132 & CCR Annual Groundwater Reports to City	Nov. 2020	Nov. 2020
Final Title 132 & CCR Annual Groundwater Reports to City	Dec. 2020	Dec. 2020
City to place CCR Annual Report in Operating Record	No later than January 31, 2021	
HDR to submit Title 132 Report to NDEE	No later than February 1, 2021	
Notification Letter(s), as necessary	TBD	TBD

PART 5.0 PAYMENTS TO ENGINEER:

Compensation for these Services shall be on a per diem basis with an agreed maximum amount of Forty-Seven Thousand One Hundred dollars (\$47,100). The following table contains a breakdown of the estimated fee by task for this project.

Task Description		Estimated Total Fee
Task 100	Groundwater Field Sampling (2 Events)	\$25,900
Task 200	2020 Spring Reporting	\$9,000
Task 300	2020 Fall Reporting	\$12,200
TOTALS		\$47,100

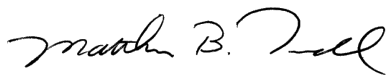
Per Diem shall mean an hourly rate equal to Direct Labor Cost times a multiplier of 3.2 to be paid as total compensation for each hour an employee works on the project, plus Reimbursable Expense.

Direct Labor Cost shall mean salaries and wages, (basic and overtime) paid to all personnel engaged directly on the Project.

Reimbursable Expense shall mean the actual expenses incurred directly or indirectly in connection with the Project for transportation travel, meals, equipment rental and field supplies, subconsultants, subcontractors, technology charge, telephone, telex, shipping and express, and other incurred expenses.

HDR will add ten percent (10%) to invoices received by HDR from subconsultants and subcontractors to cover supervision, administrative, and insurance expenses. Pace Analytical® is the contracted subcontractor for laboratory services.

This Task Order is executed this _____ day of _____, 2020.

<p>CITY OF GRAND ISLAND, NE</p> <hr/> <p>"OWNER"</p> <p>BY: _____</p> <p>NAME: _____</p> <p>TITLE: _____</p> <p>ADDRESS: _____</p> <p>_____</p>	<p>HDR ENGINEERING, INC.</p> <hr/> <p>"ENGINEER"</p> <p>BY: </p> <hr/> <p>NAME: Matthew B. Tondl</p> <hr/> <p>TITLE: Senior Vice President</p> <hr/> <p>ADDRESS: 1917 S 67th St</p> <hr/> <p>Omaha, NE 68106</p> <hr/>
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RESOLUTION 2020-54

WHEREAS, the U.S. Environmental Protection Agency's Rule for the regulation and management of Coal Combustion Residual (CCR) under the Resource Conservation and Recovery Act (RCRA) became effective on October 19, 2015; and

WHEREAS, personal at the Platte Generating Station reviewed the regulations and determined consulting services were needed to meet the CCR Rule Compliance schedule, and HDR Engineering was hired as the sole source to ensure timeliness, high quality and consistency among other electric utilities and independent power producers in Nebraska; and

WHEREAS, on September 27, 2016 Council approved HDR Engineering to complete task 1-4 to include ground water sampling, review of the Ash Landfill Closure Plan, Post-closure Plan, and Run-on/run-off Control System Plan for a cost not to exceed \$86,290.00, and

WHEREAS, on September 24, 2019 Council approved HDR Engineering to complete Tasks #5-9 to allow compliance with the CCR Rule in an amount not to exceed \$189,960.00; and

WHEREAS, on October 8, 2019, Council approved HDR Engineering to complete Task 10 to include preparation for the Title 132 Permit Renewal Application and amend the CCR Run-On and Run-Off Control System Plant at a cost not to exceed \$39,970.00; and Task 11 for the CCR 2019 Annual Landfill Inspection and Fugitive Dust Control Reporting for a cost not to exceed \$12,990.00; and

WHEREAS, on November 26, 2019, Council approved HDR Engineering to completed Task 12, upgradient Well MW-11, for a cost not to exceed \$16,660.00; and

WHEREAS, to ensure continued preparation and to address and respond to NDEE regarding the Title 132 Permit Renewal Application revisions and amend the CCR Run-on and Run-off Control System, Task 10-300, it is recommended that HDR Engineering continue with these tasks. Task 10-300 is being presented for a cost not to exceed \$14,860.00.

WHEREAS, Task 13 for the CCR Groundwater Monitoring and Reporting would include semi-annual Groundwater Sampling for the first and second half of 2020, and the 2020 Spring and Fall Groundwater Reports for a cost not to exceed \$47,100.00.

NOW, THEREFORE, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF GRAND ISLAND, NEBRASKA, that HDR Engineering is authorized to continue with Task 10-300 associated with the CCR Rule and NDEE Title 132 in an amount not to exceed \$14,860.00, and Task 13 to include semi-annual Groundwater Sampling and Reports for a cost not to exceed \$47,100.00.

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Approved as to Form	March 5, 2020	City Attorney
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Adopted by the City Council of the City of Grand Island, Nebraska, March 10, 2020.

Roger G. Steele, Mayor

Attest:

RaNae Edwards, City Clerk