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LETTER AND U S AIR FORCE RESPONSE TO U S EPA REGION VII COMMENTS
REGARDING PHASE 2 STAGE 2 REMEDIAL INVESTIGATION STUDY KANSAS CITY MO
8/24/1988
DEPARTMENT OF THE AIR FORCE



DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER-CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242-0216

File:
P.M.E. 17A-6

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88 / 0829 P1: 241, 1988
August 24, 1988

Mr. Robert L. Morby
Chief, Superfund Branch
US EPA Region VII
726 Minnesota Ave.
Kansas City, Kansas 66101

CIVIL
ENGINEERING

RE: Response to EPA Comments on IRP Phase II, Stage 2 (RI) Study for
Richards-Gebaur AFB MO

Dear Mr. Morby

The comments provided by EPA Region VII in the referenced letter dated
17 June 1988 have been reviewed. We appreciate your concerns and
recommendations.

A brief summary of our responses to these issues is provided as follows:

- a. General Comment 2: Cross-sections, where appropriate, will be constructed and presented in the report. The cross-section for the North Burn Pit Area (Site 6) will not be presented as the three borings at this site did not show any changes in soil characteristics with depth or among the borings.
- b. General Comment 3: Gradients and drainage pathways will be clarified in the figures for the final report.
- c. General Comment 4: The report will be revised to discuss the field QC samples and results in the final site-specific sections.
- d. General Comment 5: The requirement for describing wells within a three-mile radius of NPL sites has been initiated since the completion of the field portion of this study. The contractor was not asked to perform this task for these non-NPL sites (see Contract Description of Work, Appendix B of this report). However, the contractor has followed up on the issue of current private well users, and the findings will be discussed in the final report.
- e. General Comment 6: The sampling protocols will be clarified.
- f. General Comment 7: OVA readings were only one of the criteria used to determine where soil samples were to be taken. OVA readings above background and attributable to methane did not trigger soil sampling. The report will be revised to explain more clearly the use of the OVA in this study.

g. General Comment 8: The rainfall addressed was actually a one-month record rather than a 24-hour record. Actual rainfall records for the period just prior to the field effort will be presented in the final report.

h. The 11 EPA comments which specify page numbers will be addressed in the report by making the requested corrections and supplying the additional information.

i. Comment on Site 1: No wells were installed at this site due to the proximity of the landfill to Scope Creek and the marshy pond drainage. The only way to put a downgradient well at the South Landfill would have been to drill directly through landfilled material, or to emplace the well on the opposite side of Scope Creek or across the pond drainage in the marsh. The landfill is situated in a groundwater discharge area. The seeps referred to in the EPA comment are groundwater discharges caused in this natural discharge area (Scope Creek), augmented by the hydraulic head created by the adjacent pond upgradient. Any groundwater coming in contact with this landfill would be either discharged directly to Scope Creek (east) or into the marshy pond drainage (north) before entering Scope Creek. The water samples taken in Scope Creek and the seeps entering the pond drainage area would therefore detect any groundwater contamination caused by the landfill. The sampling of the seeps before mixing with Scope Creek water ensured contaminants were not missed due to dilution effects. This discussion will be strengthened in the report as well.

j. Comment on Site 2: The water sampling program at MW-6 will be clarified. The OVA readings will be discussed in this report. The contractor is gathering information on closure activities and the sewer lines placed through the landfill, and this information will be included in the report as well.

k. Comment on Site 4: Results of a soil gas survey and electromagnetic conductivity survey performed at the West Burn Area in June 1988 will be presented in an Informal Technical Information Report (ITIR) in late July 1988. An information copy of this ITIR will be provided to EPA Region VII and the Missouri Department of Natural Resources after Air Force review has been performed on the data.

l. Comment on Site 6: The report will be modified to further explain and justify the conclusion that contamination appears to be contained within the fenced area. The "pond" at the North Burn Pit Area is a small area behind a low berm within the fenced compound. Water appears in this depression only after precipitation events, and remains only a matter of days before the pool dries up from evaporation and infiltration.

m. Comment on Site 8: The recommendations for the Herbicide Burial Area will be modified as suggested.

n. Comment on Site 9: The rationale for the sampling locations will be given in the report. The recommendation for remediation will include confirmatory sampling and some upgradient soil sampling to insure against recontamination.

o. Comment on Site 10: The sampling rationale for the Hazardous Waste Drum Storage Area will be explained further in the report.

p. Comments on Site 12: The results of an additional sampling from the existing well and a soil gas survey in the grassy area downgradient of the POL Storage Yard will be presented in the ITIR mentioned in Item k above.

q. Comment on Site 13: No work was performed at Building 927 as part of this effort. The site was mentioned in the introductory sections of the report as all sites identified to date were listed for completeness. However, the AF does not ask its contractors to formulate detailed recommendations for sites they have not investigated. This site will be further investigated in the RI/FS to be undertaken in 1989. A work plan outlining the activities involved will be provided to EPA for their review.

We appreciate your continued interest and support of the IRP at Richards-Gebaur AFB. If you have any questions concerning these responses, please do not hesitate to contact Mr. Sing Chia at (214) 653-3345.

Sincerely


DUANE C. HELMSBERGER, PE
Deputy Director
Environmental Planning Division

Copy to:
Mr. Glen Yager, EPA Rgn VII
HQ AFRES/DEPV
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OEHL/TS