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LETTER AND U S AIR FORCE RESPONSE TO MISSOURI DEPARTMENT OF NATURAL  
RESOURCES 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: 17-A-6  
P.C.

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AUG 27 1988

Mr. Keith Schardein  
Chief, Superfund Section  
Missouri Department of Natural Resources  
Waste Management Program  
205 Jefferson Street  
P.O. Box 176  
Jefferson City, Missouri 65102

RE. Response to Missouri Department of Natural Resources (DNR) Comments  
on IRP Phase II, Stage 2 (RI) Study for Richards-Gebaur AFB MO

Dear Mr. Schardein

The comments provided by Missouri DNR in the referenced letter dated  
18 April 1988 have been reviewed. We appreciate your concerns and  
recommendations.

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

1. Pages 1-17 through 1-21:

a. Sites 3, 4, 5, 7 and 11 are located on property currently owned by  
the City of Kansas City. Since these sites are on formerly owned  
Department of Defense (DOD) property, US Army Corps of Engineers (COE) is  
responsible for further IRP work to fully evaluate the potential  
environmental impact of these sites.

b. Assessment of potential contamination at Site 5 will be done by  
the COE. Your concerns on potential contaminant migration from Site 5 to  
Site 1 will be forwarded to the COE for their consideration.

c. Site 13 will be investigated in the ongoing AF IRP work.

2. Page 1-20:

As indicated in paragraph 1a, Site 11 is located on formerly owned DOD  
property. Evaluation of potential environmental impact of this site will  
be conducted by the COE. Your concerns on the potential impact of Big  
Irons, Inc., paint stripping operation on this site will be forwarded to  
the COE for their consideration.

3. Pages 1-24 and 1-26:

The tables will be restructured in the final document.

4. Page 2-9:

No; the wells located off-base in the Belton Mobile Home Park were not  
sampled. The contractor has followed up on the current status of these  
wells, and the information will be provided in the report.

## 5. Page 3-18:

The soil samples at the two landfills were taken from borings outside the landfill boundaries. The soil samples analyzed were not expected to be contaminated by the landfill waste materials unless the contamination was waterborne; therefore, additional target parameters were analyzed on groundwater samples for the suspected contaminants. The parameters analyzed for at the North Burn Pit Area were the same in soil and water samples. The only discrepancy in the analyses at the Herbicide Burial Area was an additional analysis for pesticides in the surface water sample. The apparent discrepancy at the Hazardous Waste Drum Storage Area is due to the fact that soil leachability tests were run for metals, and priority pollutant metals were tested in water. Barium was run separately for waters as it is not one of the priority pollutant metals, and the separate water analysis for mercury at this site was a redundancy. The analyses at the POL Storage Area were identical for soil and water.

## 6. Page 3-26:

Since the completion of Phase II, Stage 2 field investigation, Site 8 was transferred to the COE as it is on formerly owned DOD property. This comment will be forwarded to the COE for their consideration.

## 7. Page 4-5:

The intermittent streams are in fact surface water drainage pathways. Sampling was done in Scope Creek, which was flowing at the time of sampling. The report will clarify this issue.

## 8. Pages 4-5 through 4-6:

The pond and marshy area were not sampled as a part of this effort as they are up gradient of the South Landfill, and no contamination was expected. The landfill is situated in a groundwater discharge area. Any groundwater coming in contact with this landfill would either be 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 from the seeps entering the pond drainage area would, therefore, detect any groundwater contamination caused by the landfill. The sampling of these seeps before mixing with Scope Creek water ensured contaminants were not missed due to dilution. This discussion will be strengthened in the report.

## 9. Page 4-32:

The remedial efforts undertaken at this site included removal of asphalt and 1-2 inches of soil. This material was then drummed and disposed of as hazardous waste. This site did receive a RCRA violation in 1985 for improper storage and labeling of drums of hazardous waste. These

drums were subsequently labeled and disposed of and the violation was cleared with EPA. The site cleanup was conducted as a result of this RCRA violation.

10. Page 6-1:

The recommendation of no further action for Site 1 does not preclude further IRP investigation to be conducted by the COE at Site 5 (paragraph 1b). The results of soil and water samples collected at Site 1 justify the decision of no further action. The results showed no contamination, whether from Site 1 itself or from the influence of Site 5.

11. Page 6-9, Site 9:

This comment will be taken into consideration during the completion of the RI/FS.

12. Page 6-9, Site 10:

Concur.

13. Pages 6-10 and 6-11:

Installation of monitoring wells for Site 12, the POL Storage Area, will determine if contaminants are migrating from the site. The next stage of study will define the extent of soil removal through the results of limited soil sample analysis.

14. Page 6-11:

Page 6-11:

Concur.

We appreciate your continued interest and support of the IRP at Richards-Gebaur AFB. If you have any questions concerning these responses, please call Mr. Sing Chia at (214) 653-3345.

Sincerely

  
DUANE C. HELMSBERGER, PE  
Deputy Director  
Environmental Planning Division

Copy to:  
AFRES/DEPV  
442 CSG/DEEV ✓  
OEHL/TS