MEMORANDUM AND U S AIR FORCE RESPONSE TO MISSOURI DEPARTMENT OF NATURAL RESOURCES COMMENTS REGARDING DRAFT PRELIMINARY ASSESSMENT/SITE INSPECTION OF SITE SS009 KANSAS CITY MO
10/6/1995
AIR FORCE BASE CONVERSION AGENCY

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DEPARTMENT OF THE AIR FORCE
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MEMORANDUM FOR MISSOURI DEPARTMENT OF NATURAL RESOURCES
ATTN MR GLENN GOLSON

FROM OPERATING LOCATION Q, AFBCA
15471 Hangar Road
Kansas City, MO 64147-1220

SUBJECT. PA/SI at the IRP Site, Fire Valve Area

1. Thank you for the MDNR comments provided in your 7 Aug 95 letter, on the draft report titled *Preliminary Assessment/Site Inspection of IRP site SS009, Richards-Gebaur AFB, MO* Below is our response to your concerns. Enclosed (Atch. 1) is a copy of the draft final report. Please indicate within ten (10) working days if all MNDR concerns have been addressed

MDNR introductory comment on FSB8 and FSB18
A discussion on the source of contamination for FSB-8 has been added to the PA/SI report in section 2 5 The presence of ethylbenzene and xylene in FSB-8 was not discussed in any detail in the report because their concentrations are two orders of magnitude below any levels of concern The source of contamination found at FSB-8 is difficult to identify as the boring was located along the water line trench, however, the distance is approximately 200 feet northwest of the original Fire Valve Area excavation, and adjacent to the intersection of Westover and Corkill roads. The shallow depth of the soil sample (2 5 feet) and the trace amount of ethylbenzene and xylene detected in the sample (104 µg/kg) indicate that the source may not have been associated with activities in Building 605 A discussion on the limits of contamination (boring FSB-18) has been added to the PA/SI report in section 2 1 1

MDNR comment for section 1 5, page 8
The *IRP Records Search, 1983*, was utilized for the geology data presented in the draft report Figure 1 5-1 in the *IRP Records Search,* notes a thickness of 65 feet for the Lane Formation. The PA/SI report has been revised to reflect the 20 to 60 foot thickness range of the Lane Formation, and other data presented in *Geology of the Belton Quadrangle, 1984* The PA/SI drilling program did not include bedrock coring; therefore, it is difficult to identify the bedrock unit underlying the Fire Valve Area in absolute terms The ground surface at the Fire Valve Area is about 1008 feet above mean sea level (MSL) according to a 1973 aerial topographical survey According to a preconstruction report for Building 603 (former Medical Clinic), the top of the Raytown Limestone Member (Iola Formation) was encountered between 13 and 15 feet below ground surface This places the top of the Raytown Limestone Member between 993 and 995 feet above MSL, 400 feet from the Fire Valve Area. Based on the preconstruction report for Building 603, the outcrop map in *Geology of the Belton Quadrangle,* and the limestone fragments in the Fire Valve Area samplers, the bedrock encountered during the drilling program for the Fire Valve Area was probably the Raytown Limestone Member The clays encountered during the drilling program were typical of weathered Lane Formation shales (Appendix C) The *Geology of the Belton Quadrangle* reports that sandstone lenses, from cross-bedded riverbed deposits, can be found in the top of the Lane Formation Sandstone was not encountered in any of the 22 soil borings drilled at the site The site appears to be on an eroded surface of the Lane Formation, about 14 foot thick Confirmation of the existence, or absence of this sandstone feature can not be established from the PA/SI drilling program data, which only profiled unconsolidated

soils. A rock coring of the bedrock unit under the site, would establish where the Fire Valve Area site is located on a generalized geological column Due to the sporadic nature of river deposits, a more extensive soil boring program is required before any conclusions can be drawn as to presence, or absence of this sandstone feature in the Lane Formation at the site

MDNR comment for Figure 1 5-3, page 12
Figures 1 5-3 and 2 5-2, have been corrected.

MDNR comment for section 2 1 1, page 18, paragraph 2
This comment is now addressed in section 2 1 1. The soil boring program was completed at FSB-18 as the boring was clean In addition, the previous boring located 110 feet to the northeast showed only trace amounts of contamination Also, FSB-18 is over 200 feet from the original Fire Valve Area excavation The detected and observed contamination was limited to the soils adjacent to the water line and adjacent to portions of Building 605 where industrial operations occurred. From this, we surmise that contamination within the Fire Valve Area is the result of past activities associated with the building

MDNR comment for section 2 4, page 26, last paragraph
The comment has been addressed in the report

MDNR comment for section 2 5, page 27
Comment addressed in the report. Also see related response to the first comment

MDNR comment for Figure 2 5-2, page 29
Figures 1 5-3 and 2 5-2, have been corrected to indicate 370 ppm TPH concentrations

MDNR comment for section 3 1 4, page 35-36
Comment addressed with additional text in this section.

MDNR comment for section 3 0, page 32
Although not directly investigated within this PA/SI, the groundwater to surface water pathway discussion in section 3 1 2 has been expanded

2 I can be reached at (816) 348-25114, x28 if you have any questions about these responses, or the draft final PA/SI report

P. Mark Esch

P MARK ESCH
BRAC Environmental Coordinator

1 Attachment
Preliminary Assessment/Site Inspection of IRP Site SS009

cc
1 EPA (Bob Koke)
2 MDNR (Bob Geller)
3 AFCEE (Fred Waterman) w/o ATCH 1