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LETTER AND COMMENTS FROM MISSOURI DEPARTMENT OF HEALTH REGARDING
PROPOSED NO FURTHER RESPONSE ACTION PLANNED DOCUMENTS FOR SITES
CS001, CS002, SS003, SS004, SS008 AND ST007 KANSAS CITY MO
7/29/1998
MISSOURI DEPARTMENT OF NATURAL RESOURCES

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

McCormack Governor • Stephen M. Millwood, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

July 29, 1998

Mr. John H. Fringer, P.E.
AFBCA/DB
1700 North Moore Street, Suite 2300
Arlington, VA 22209-2802

RE: Proposed NFRAP documents submitted for CS001, CS002, SS003, SS004,
SS008, and ST007

Dear Mr. Fringer:

I asked the Missouri Department of Health (MDOH) to review the subject documents so that their concerns are addressed as part of closure process. The following comments are provided for your action/response

In general, MDOH saw two problems with the documents. First, the documents all stated that the water onsite is "highly saline...generally nonpotable" and that "perched groundwater occur(s) locally but are not used for drinking water." The MDOH believe these may exaggerate the situation onsite.

Second, the reports do not provide documentation of statements regarding sampling results. For example, the report for SS004 states, "no metals or VOCs were detected at concentrations that exceeded MCLs." The document, however, does not provide the sample results, so this statement cannot be verified. As a second example, the report for CS001 states that all post-excavation samples were non-detects. Without the sample results it can't be determine what the PQLs were; so it can't be determined whether the verification sampling was adequate. Using past reports to verify these statements is cumbersome and defeats the purpose of a stand-alone document

As stated previously, MDOH can not concur with the no further action decision on CS001, without knowing their detection limits. For site CS002, MDOH will defer to the Underground/Leaking Underground Storage Tank (UST/LUST) regulations. Based on UST/LUST Section's evaluation, they may determine that 200 ppm should be the appropriate "matrix" value for the site (rather than the 500 ppm used by the authors).

On SS004, as stated earlier, MDOH has no verification that statement documented is correct.

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At ST007, MDOH feels there should be further work as determined by the UST/LUST Section, and soil that exceeds the matrix value should be remediated, regardless of whether it is surface or subsurface

Finally, MDOH also questions the decision on SS008. While only one sample was elevated, sample HA-1, and was the sample closest to the observed area of contamination. While the sampling demonstrates that there isn't widespread contamination at the site, it does appear that there is a hot spot that should be remediated.

If you have any questions you may call me at (573) 751-2506

Sincerely,

HAZARDOUS WASTE PROGRAM



Guy Frazier, Project Manager, DOD Unit
Federal Facilities Section

GF:lg

c: Bob Koke, EPA

Randy Maley, MDOH