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MINUTES FOR BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING HELD 9  
JULY 1998 KANSAS CITY MO  
7/30/1998  
CCI

July 30, 1998

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Meeting Minutes of the Richards-Gebaur BCT

PLACE: 15471 Hangar Road, Kansas City, Missouri

DATE: Thursday, July 9, 1998

Attending:

Peter Barrett, CH2M HILL  
Jill Benefield, PKVCB  
Dale Cira, CH2M HILL  
Alan Friedstrom, AFBCA/DB  
John Fringer, BEC  
Guy Frazier, MDNR  
Kay Grosinske, AFCEE/ERB  
Rene Hefner, Brooks AFB  
Don Kerns, MDNR  
Robert Koke, EPA Region 7  
Paul Lanthier, Unitec  
Mary Urey, HSC-PKVCB  
Bob Zuiss, OLQ  
Syd Courson, CCI

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#### AGENDA ITEMS

(Bold face highlights action items, persons responsible and applicable due dates.)

Item 1 (June BCT Minutes approval)  
Minutes approved with no changes.

#### Item 2 (UST Closure/Registration Update)

Monica Rakovan, an Air Force consultant, said via telephone that Hugh Murrell of MDNR's UST section told her July 3 that all data had been recorded and the USTs had been registered. He said he would consult with his superior, Bill Wilder, and then discuss them with the Air Force. She said the Air Force will receive a summary document showing how many tanks are entered, and how many were closed officially. She said the plan is to close the tanks removed prior to December 1988, while those remaining after that date will be listed as open pending Air Force submittal of sufficient information to allow closure. Rakovan said 35 of the 40 tanks will be closed under the UST regulations.

**John Fringer of the Air Force asked when the summary document would be available and Rakovan and MDNR's Guy Frazier indicated that next week would be the target.**

#### Item 3 (Discussion of IRP Work Schedule)

Item 5 (Discussion of Air Force's Response to MDNR' Comments on NFRAP SS006 -- taken out of order as part of Item 3)

**Fringer said the FOST and EBSS reports will be drafted and submitted to the Air Force by Aug. 14, 1998. Fringer said the Air Force will need a couple of weeks to review the documents and that MDNR and EPA probably will receive drafts by Aug. 28, 1998.**

Dale Cira of CH2MHill was making revisions to the IRP work schedule so the discussion was deferred pending his return.

Fringer said the Air Force has revised its schedule to allow for a base-wide groundwater evaluation report. He said the Air Force is reviewing all of its documents to see which have responses to regulators' comments. He said that review was prompted because no Air Force responses were found to MDNR's past comments on SS006.

The Air Force will do a well survey in the area as part of the groundwater evaluation. Kerns told the Air Force that even if the wells on or near Richards-Gebaur are not operational it doesn't mean anything. He said what matters is whether the groundwater is potable.

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Fringer, Barrett and Cira each pointed out that the Air Force considers the groundwater nonpotable, repeating what they have said in past BCT meetings. They said the amount of groundwater is insufficient to make it viable as a source, and what was there had such high concentrations of sediment and salt that it is undrinkable. Barrett also pointed out that the area gets its water supply from the Kansas City Water Department. MDNR said the state is looking at potability now and the probable use of the groundwater in the future.

Cira returned with copies of the IRP schedule, and said the groundwater evaluation will be an appendix to the E&C report. He said it was a pivotal issue affecting many of the NFRAPs. **He said the evaluation should be completed by Aug. 28, and the Air Force should complete its internal review by Sept.23. Cira said the Air Force was anticipating a 30-day review by MDNR.**

Kerns asked if Cira contemplated an historical review, or if CH2MHill would go back and look at sampling and other information. Cira said the study would include looking at information already gathered, looking at a groundwater use survey of the surrounding area, and considering the current state of hydro-geology at R-G. He said it would evaluate the regional hydro-geology and see how that fits with R-G.

Kerns asked if any field work would be done and Cira said the E&C report would involve only evaluation of existing data. Cira said the groundwater use survey would be used to answer some of the questions MDNR has asked (including comments about SS006) but which the Air Force has not answered.

Cira said the Air Force wants to find out precisely what data will satisfy MDNR, and Kerns said the key is to characterize the site adequately.

Fringer asked Kerns if MDNR's comments on the SS006 NFRAP are its final comments. Kerns said he could write another 20 pages of comments, but it amounts to, "If you want to close the base, then characterize the site and let us know what we have here."

Barrett asked why sites that posed no threat to public health and the environment needed to be characterized, and Kerns said if the sites are not characterized there is no way of knowing there is no risk.

Barrett said the groundwater was no risk if it wasn't potable, and Kerns said it had not been determined that the water was nonpotable. Fringer said the wells drilled in the area were not productive so they were shut down, and Barrett said Belton drilled a well but shut it down because it could get water elsewhere.

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Barrett said the Air Force was trying not to "over-invest" in site characterization and Kerns replied that the Air Force has been "trying not to over-invest at this site for the last 15 years." He said that is why "we are where we are right now."

Fringer said the "purpose of this whole study to determine if that data is conclusive to show that there is no unacceptable risk. If it shows we need additional data we will go out and get it."

Alan Friedstrom, AFBCA/DB, asked MDNR if there are sections of language in the SS006 NFRAP that, once certain issues are ironed out, could be used generically in all NFRAPS. Kerns said he would have to think about that.

Fringer told Kerns that the Air Force wants to address MDNR comments completely so the documents could be approved, rather than bounce back and forth. Cira said clear, specific comments from MDNR would speed the process. He said if MDNR says the Air Force needs to install a certain number of wells or take a certain number of samples, the recommendation will be considered. But, he said, a vague statement that more characterization is needed offers no guidance. Kerns said MDNR is willing to help out on the statement of work.

Fringer said the first thing that has to be done is the groundwater evaluation. He said the Air Force wants to prove beyond a reasonable doubt there is no risk to the human health and environment, and make sure that the decision is legally defensible.

Rene Hefner of Brooks AFB asked if the BCT believed the base geology has been characterized sufficiently. Kerns said he did not believe it had. Hefner said the objective of the groundwater study is to look at all the historical data that exists, get a handle on it, and see if there needs to be more work. He said a full understanding of the hydro-geological data will help determine if contaminants are migrating, if they are going to migrate, and where they are going to migrate.

Barrett said MDNR and the Air Force each has a perspective: MDNR has the traditional characterize and characterize perspective. The Air Force takes a risk management approach -- what are the real risks.

Barrett asked MDNR, "Where do we go from there?" if the hydrogeological characterization demonstrates the water is nonpotable.

Frazier replied that if MDNR agreed that contamination could be left in the groundwater it would be saying it's OK because no one is using it. Frazier said the Air Force can make reasonable assumptions about nonpotability, but that is not the responsible thing to do.

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Fringer said he believed the responsible thing to do is show that there is no reasonable expectation of using this ground water.

In a discussion of site SS006, Cira said it is reasonable to conclude that the source of groundwater contamination is waste material that spilled from a waste material storage area on the site itself.

Kerns asked why this was not cited in the NFRAP document. Cira said it was logical to conclude that an area designated as a waste storage area might have normal spillage that would account for the contamination in the groundwater at that site.

Kerns replied that the Air Force should go down and find out. He said the Air Force had done nothing, and had not responded to MDNR's comments. He said if the Air Force submits a NFRAP document that states there is no problem and no one is going to be harmed, ever, MDNR is not going to accept that without adequate supporting data.

Fringer asked if that was a generic comment for all sites, and Kerns replied that was the case when it involves groundwater. Frazier added that such language would be in all MDNR responses to NFRAPs.

Cira asked Kerns if he was saying that MDNR would respond that none of the 23 sites are adequately characterized, including the 14 for which CH2Mhill has prepared or is in the process of preparing NFRAPs.

Kerns said he was not saying that, because he does not know what has been done at all of those sites. Frazier said the difference is in assumptions. He said that CH2Mhill is making a reasonable assumption that there is no risk so nothing else has to be done, while MDNR is making a reasonable assumption that more data is necessary before a "no-risk" position can be defended.

Fringer wrote down what he heard as MDNR concerns on a "flip chart":

- For each site, has the nature and extent of contamination been addressed?
- Was it ever contaminated?
- If so, where did it come from?
- Where is it going?
- Was it ever characterized?
- Was it ever cleaned up?

Frazier and Kerns said that accurately reflected MDNR's concerns.

Cira posed the following to MDNR: If groundwater on site SS006 is not a threat to human health or the environment, and the source is gone, can the Air Force close the site if it continues long-term monitoring?

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Frazier asked Cira if he knows the source is gone and Cira replied that he believes the source is gone. Frazier said groundwater moves slowly and Kerns said MDNR cannot base its decision on subjective beliefs.

Kerns said a good hydrogeology study could help determine the flow of groundwater, and help determine the direction contaminants would migrate, but that it would not identify the source of the contamination.

The facilitator pointed out that CH2MHill said early in the meeting that was precisely what it planned to do. He said that once the hydrogeology study is completed, it may answer some questions, or it may raise more questions. Kerns said he imagines there will be more questions than answers.

Fringer said that the groundwater evaluation is not being undertaken to try to show that the groundwater is not potable. It is to evaluate the regional geology to see if there is enough evidence to show that the site data corresponds to that regional geology, and if more data is needed to show if there is a reasonable pathway to the receptor.

Kerns said the State will be very critical of a report like that because if MDNR agrees, then it becomes MDNR's problem if something goes wrong.

Kerns said the problem the state has had about R-G is trying to figure out what has happened. He said that shouldn't be a problem because R-G is a minor site when it comes to contaminants. He said the problem lies in the fact that adequate data is not available because the investigations by contractors has been inadequate. He said contractors have followed the letter of the contracts, and if they said drill 16 monitoring wells eight feet deep, that's what they did, even though the work plan should have required different specifications.

Fringer asked if the state routinely reviewed the Air Force work plans and Frazier said the plans were reviewed, returned with comments, and the Air Force never responded. Fringer said the Air Force was re-examining those documents to see why MDNR's comments weren't addressed. He said the Air Force also wants to see if the comments were significant. Frazier said that if MDNR took the trouble to make the comments they were significant.

#### Item 4 (Evaluation & Consolidation Study Update)

Cira said the data from the 23 sites at Richards-Gebaur have been reviewed, and that 15 potential NFRAP sites were identified. He said that as a result of discussion during today's BCT meeting, CS002 (OWS704) will be pulled from the 15.

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**He said seven NFRAP documents were submitted to MDNR in May 1998, and seven more are due to be submitted to MDNR in August 1998.** That leaves nine sites requiring additional work before closure can be supported. He added that base on discussions with MDNR that number might increase. The non-NFRAP sites, and issues to be considered, are:

- AOC-001, Central Drainage Area, characterization of metals in sediments and surface water.
- AOC-003, Firing Range, evaluation of metals in soils; revise 1993 "no risk" assessment to meet 1998 standards.
- FT002, North Burn Pit, characterization of soils under concrete to determine if it meets cleanup levels.
- XO-001, Belton Training Complex, characterization of metals in soils and surface water and risk assessment.

The following are sites involving the Fuel Hydrant Distribution System

- ST005, POL Yard, insufficient characterization to perform field study
- AOC-12, Fuel Hydrant Line, insufficient characterization
- AOC-006, Tarmac Fuel Line, insufficient characterization
- CS003, OWS 9470B (POL), insufficient characterization, still operating
- AOC-12A Industrial Waste Line, insufficient characterization

During discussions of the above-referenced sites, Barrett said the risk assessment of AOC-003 (Firing Range) was conducted five years ago and it was determined the risk was in the  $10^{-4}$  to  $10^{-6}$  range. Barrett said that risk assessment did not look at the carcinogenic effects of lead, and there were some other inconsistencies. He said the Air Force wants to revisit it so everyone would feel more comfortable.

Frazier asked if the Air Force planned to let it stay as it is. Barrett said that would be the case if the revised risk assessment supported that conclusion. Barrett said new DOD guidance coming out says the action level for lead is 400 ppm. He said the guidance says if it is below that level it's O.K.; if it exceeds 5,000 ppm it better be cleaned up, and if it is somewhere in between the risk should be assessed.

Frazier said the State Health Department action level is 240 ppm. He said that is what MDNR has held Whiteman AFB to, and what MDNR expects at Richards-Gebaur.

Barrett said that XO-001 (Belton Training Complex) has concentrations of contaminants above any-use soil levels, but not very much above the levels, so the Air Force believes it can do a risk assessment and gauge what the actual human health risks are.

Kerns and Frazier said the state will have new regulations promulgated by the middle of July. Fringer said that Barrett had given the Air Force a list of the current state ASLs, but Frazier said MDNR does not follow them because they are not protective of the groundwater. He said that is why they are being revised.

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During the discussion of the five sites that are considered part of the Fuel Hydrant Distribution System, Fringer said the Air Force has received the draft statement of work for the Tarmac Fuel Line sampling. He said it would be discussed after the meeting and that it was being studied by the Air Force to make sure it touched on all of the issues.

Item 6. (Other Business)

None

Item 7. (Proposed August Agenda item)

State comments on NFRAPs CS001, CS002, SS003, SS004, ST007 and SS008. Frazier said the comments are due July 28 and that the state will meet the deadline.

Meeting adjourned.

Minutes prepared and submitted by:

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Syd Courson, CCI