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MINUTES FOR FIRST BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING
HELD 10 NOVEMBER 1994 KANSAS CITY MO
11/30/1994
RICHARDS GEBUR AIR FORCE BASE

FINAL
11/30/94 # 87

MEMORANDUM FOR BCT MEMBERS

FROM: OL Q AFBCA (Mr. Esch)

SUBJECT: Minutes for the first BRAC Cleanup Team Meeting

1. The first BRAC Cleanup Team (BCT) meeting was held on the 10th of November, 1994, at 401 Ward Parkway in Kansas City, MO.
2. BCT members present included:
P. Mark Esch, OL Q AFBCA
Karen Flournoy, USEPA-Region 7
Bob Geller, MDNR
3. The agenda for the meeting included:
 - A. Establishing formalities & ground rules in making decisions
 - B. Approving RAB members
 - C. Discussing cleanup levels
 - D. Discussing which parcels are strong & could be considered candidates for leasing

The meeting was called to order by Mr. Esch and he asked what kind of documentation was needed to document BCT decisions. He stated that unanimous decisions, alternate decisions, and agreements on cleanup of 'areas of concern sites' are needed.

Mr. Bob Geller stated that they have asked for a lot of information but are not receiving answers. He said that the Air Force needs to sit down and prioritize the workload.

Mr. Mark Esch said that he doesn't have enough personnel to handle the workload.

Mr. Geller stated that the Air Force needs to identify what projects they are working on in order to prioritize. "The sooner MDNR is involved and know, the quicker the "cleanup" will begin," he said. " We're willing to provide comments in early phase - let us know. Line up issues and set a time frame for transferring property. I recommended that priorities be established on sites to be cleaned up; compounds listed (starting with POL yard); and come up with a number. List ~~regulations~~ regulations that only apply to USTs, anything else needs to look at health based, more strenuous, regulations. There may be some deviations from this because of industrial use on the property. The following areas need to be resolved:

- Identification of areas of concern (cleanup levels)
- Schedule
- Agree with decision document"

He stated that MDNR's intent is to be involved in every step of the process. "We have dedicated a staff person to provide you comments, etc., when asked. Any sites that are impacting off-site (public) should be first concern. The sites may or may not

have any contamination off-site. Also provide the public with information about what is found, let them know, keep them apprised and ask for input from the public early on in the process.

Ms. Karen Flournoy said that the base needs to comply with the CERCLA process. "Be clear about the process and keep to the title of the subject," she said. "Describe the problem, describe the options and have a public comment period. The interim removal plans must follow the IRP guidelines - the EICA guidelines is the vehicle for guidance and is required for all non-time critical. IRA removals is for time critical. Still do a Decision Document. EPA can give you EICA guidance from Ft. Riley or other sites. Some things must always be done - everyone does an EICA for non-time critical sites."

Removals
IRA

Mr. Esch stated that he needed to reevaluate how the Air Force is approaching critical versus non-time critical removals.

Ms. Flournoy said that there will be a ROD for the sites (a ROD has to tie up the process) so the public will know that all sites have been addressed.

Mr. Geller recommended that decision documents be approved by BCT - the State at a minimum.

Ms. Flournoy said that the Defense Department has it's own regulations but a State or Federal buy-in is important. She said it was important to keep the public informed. This could be done by sending mailings, comments, and final comments at RAB meetings will benefit down the road, she said. She said to look at responses with State and EPA.

Mr. Geller recommended sending invitations to the public to be on RAB. He also recommended to not limit the number of members, to leave it open. He said RAB is there to accommodate the public. He asked who the contractors were that scored the UST cleanup level. Mr. Esch said that there were three: Martha Kopper, O'Brien and Gere Contractors, and himself. They all three came up with the same score.

Mr. Esch proposed that one parcel that encompasses a billeting area (three dorms, restaurant, and pool) has not had any indication of any kind of contamination and no history of wastes. The only thing was tallow collected from the grills in the restaurant and the activities have been the same since the beginning. He hasn't heard any controversy from MDNR or EPA.

Mr. Geller agreed in general that this sounded like a prime candidate but asbestos and lead-based paint need to be assessed.

Mr. Esch said that the Air Force is putting together a lead-based paint survey on all DoD buildings to meet EPA's standards. The AF will provide complete disclosure when transferring property.

That documentation will stay with DoD. If there is a problem, DoD will still own the property. The Air Force has a list of what was tested for asbestos. There is complete disclosure with asbestos. If AF provides CD to property owner it is much like a warranty you get when you buy a used car (as is).

Ms. Flournoy said that asbestos is a hazardous substance. This is a significant health issue but it sounds like the asbestos is well contained. If it's in a friable condition EPA will object.

Mr. Esch stated that he holds a certification for an asbestos inspector.

Mr. Geller said that this doesn't look like an untenable situation.

Ms. Flournoy said that she will discuss lead-based paint and asbestos with colleagues and see EPA guidance.

Mr. Geller said if you find information, conference call me.

Mr. Esch said to let him know a month ahead so he can schedule a contractor to survey. One was done in 1987. It needs to be resurveyed every 3 years.

Mr. Geller said a lead-based paint survey and asbestos survey needs to be done before transferring the property.

Mr. Geller stated that the drainage pond needed to be addressed (at RAB). The BCT is part of the RAB and they should look at this site as a priority. He told Mr. Esch to see MDNR's comments on the pond. All levels were below the any use levels. He said that those are totally withdrawn - they are not guidance - the Air Force does not have any cleanup numbers from MDNR.

Ms. Flournoy said tha the EPA should look at it before AF does anything. (re. sampling) A comprehensive groundwater study needs to be done. Remediation is another story. She asked if it is a threat? She said to be clear. She stated that the base must make sure that health based cleanup requirements are being met. All sites will be studied exactly the same. She said to look at compounds and establish a standard number. List compounds, look at health-based numbers. It's to AF advantage to look at industrial standards.

Mr. Esch is looking into a hydropunch. May make sense to use a hydropunch, the positive's of using it is that it's quick and easy. But the negative is that it does not have the quality control of a monitoring well.

Mr. Geller said to look at areas that have potential groundwater contamination. Refer to MDNR geologist.

Ms. Flournoy said they need to know flow (direction), overall

site characterization, and to move into unit by unit basis, need to look at broader based-may be very localized but program requirements require it. EPA doesn't have enough information. She wants a total evaluation of groundwater.

Mr. Esch said the drainage pond has a low volume of sediments. Below is a bentonite liner that is dry (no water movement through liner).

Ms. Flournoy said to follow the guidelines - Spill Cleanup in TSCA Regs. Sediments that aren't getting into the pond may be part of problem - may not be able to draw conclusions from data. She's concerned. The clay liner could pass sediments through liner.

Mr. Esch said that ground water samples have been collected and there are non-detects all the way through. Tends to indicate there is no leakage. All samples of water has shown no contamination.

Mr. Geller asked if the water discharged through the storm vent had been sampled.

Mr. Esch said that he believed the pond was correctly designed for watershed for the size of the oil separator. The new one has been designed to include all influent streams.

Ms. Flournoy said that this is not clear in the documentation. Lots of concerns are raised. Information is not clear. For EPA to give the Air Force the best response regarding anything, EPA needs to understand how it works. This is a priority she stated. The EPA wants a comprehensive groundwater study. Call the draft report a site characteristic document, not a RFI. The EPA has lots of pieces of information but they need more details and comprehensive documentation. The EPA has some serious concerns: things sound good but we are not much farther along than we were several months ago, she said.

Mr. Geller stated that if we can't see some improvements we will have to go above you to get the answers - we will talk to Washington.

It was decided that a one to two page fact sheet would be handed out at the next RAB meeting in February.

It was decided that RAB membership will remain open to all participants.

Marilyn Kubler
BRAC Community Relations Coordinator
BCT Recorder