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LETTER AND U S AIR FORCE RESPONSE TO MISSOURI DEPARTMENT OF NATURAL
RESOURCES COMMENTS REGARDING BASE REALIGNMENT AND CLOSURE CLEANUP
PLAN KANSAS CITY MO
11/30/1994
RICHARDS GEBEUR AIR FORCE BASE



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DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

30 Nov 94

OL Q, AFBCA (P. Mark Esch)
15471 Hangar Road
Kansas City, MO 64147-1220

Mr. Glenn Golson
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Mr. Golson;

Please reference MDNR's 28 Apr 94 letter concerning the BRAC Cleanup Plan. Enclosed please find the Air Force Base Conversion Agency (AFBCA) response to this letter.

MDNR comment on page 3-10, section 3.3.4
All base records are open for MDNR review

MDNR comment on page ES-2, Site ST005

We support a cooperative effort by the Corps of Engineers in remediating this site. Due to funding shortfalls and legal contract snags, the remediation date for this site has changed to early 1995. The site was reclassified as a compliance site due to the CERCLA petroleum exclusion clause and the lack of CERCLA-listed waste being discovered at the site. The design proposed may be a biocell. MDNR will have the opportunity to comment on the application of this remedial design via Site Work Plans to be developed by the contractor. We understand that MDNR will also be setting the ARARs for any remediated soil that will be subsequently used as backfill at the site.

MDNR comment on page ES-3, Site SS008

The additional sampling refers to the phase 2 SI work at the site; no additional sampling has been conducted up to this point in time. MDNR comments on the PA/SI for this site were received after this plan was printed. Regulatory comments are important to scoping follow-on work at the site. Scoping begins after all comments are in hand. According to the BRAC Cleanup Team guidebook, developing the scope of work is a cooperative effort by AFBCA, MDNR, and USEPA. We look forward to discussing the project scope in the near future.

MDNR comment about the fuel line leak

IRP sites must contain CERCLA-listed wastes to qualify for funding under this program. Due to the petroleum exclusion clause, we do not expect to find CERCLA-listed wastes at this site just as we found no CERCLA-listed wastes at the POL Storage Yard (fuel line source). Missouri

underground storage tank regulations and cleanup criteria (10 CSR 20-10) are applicable to the site (hydrant fueling systems are deferred from all requirements contained in 10CSR20-10 except the release response provisions). Request MDNR advise us if this is not the correct approach, and set the ARARs for this and all UST sites at the base (industrial use) at your earliest convenience.

If there are any questions concerning our response, please call P. Mark Esch at (912)348-2514.

Sincerely

SIGNED

P. Mark Esch
BRAC Environmental Coordinator

cc. AFBCA/CE (MICHAEL CARSON)