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LETTER AND COMMENTS FROM MISSOURI DEPARTMENT OF NATURAL RESOURCES
REGARDING PRELIMINARY ASSESSMENT/SITE INVESTIGATION OF SITE SS009 KANSAS
CITY MO
8/7/1995
MISSOURI DEPARTMENT OF CONSERVATION

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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan Governor • David A. Shinn Director



DIVISION OF ENVIRONMENTAL QUALITY
P O Box 176 Jefferson City, MO 65102-0176

August 7, 1995

Mr. Mark Esch
OL Q, AFBCA
15471 Hangar Road
Kansas City, KS 64147-1220

RE: Site SS009, Richards-Gebaur Air Force Base

Dear Mr. Esch:

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RECEIVED

The Missouri Department of Natural Resources has completed its review of the document titled, *Preliminary Assessment/Site Investigation of IRP Site SS009, Richards-Gebaur Air Force Base, Missouri*. In general, the document was well written, and the investigation was adequate for initial site investigation purposes. The primary concern is that the contamination in FSB8 was not directly addressed. Is it assumed to have a different source? Also, considering the discontinuous nature of the contamination, is it correct to assume that there is no contamination south of FSB18? Specific comments follow.

Section 1.5, page 8: The description of the Land Formation does not include mention of a discontinuous sandstone layer within the unit. Figure 1.5-1 appears to be compiled from, *Geology of the Belton Quadrangle* by Richard Gentile. In the text of that document Gentile states, "Several feet of massive to cross-bedded sandstone is present near the top of the Lane, in exposures on the Richards-Gebaur U.S. Air Force Base (Sec. 3, T. 46N., R. 33 W.)." Since the presence of a massive sandstone layer would affect site hydrogeology, it should be noted whether the sandstone is believed to be present beneath the site.

Figure 1.5-3, page 12: Though not labeled, the appearance of this figure implies a depth to bedrock that varies along the length of the trench. If the line at the base of the clay is intended to represent the bedrock surface, then it should encounter FVB3 and FVB1, which met refusal at presumed bedrock. Since data is not available along the rest of the trench, this line should be dashed. In short, if the line at the base of the clay does not mean anything, it should not be there. If it represents the bedrock surface, it should be labeled and drawn correctly. This comment also applies to the figure on page 29.

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Section 2.1.1, page 18, paragraph 2: The discontinuous nature of the contamination had already been demonstrated during the drilling of boreholes to the north along the water line. It is somewhat puzzling that a single uncontaminated borehole to the south was considered to be the limit of contamination in this area.

Section 2.4, page 26, last paragraph: Here it is stated that FVB5-3 is the replicate for FVB4-3, but it is stated elsewhere that it is the replicate for FVB3-3. The analyses for FVB5-3 are more consistent with FVB3-3.

Section 2.5, Contaminants and Trend Analysis, page 27: The BTEX contamination in FSB8 should be more directly addressed here, and it should also be mentioned in section 2.6, Sources.

Figure 2.5.2, page 29: The TPH concentration in FSB3-3 is 370 ppm, not 350 ppm.

Section 3.1.4, Surface Water Exposure Pathways: This description of the point at which the site drainage becomes perennial is not consistent with the description in the *Assessment of the Drainage Pond*. I believe that Scope Creek probably becomes perennial below the marshy area downgradient from the drainage pond.

Section 3.0, Migration Pathways: Groundwater to surface water is another potential pathway at this site.

In conclusion, I agree that the potential for groundwater contamination in this area should be investigated. If groundwater contamination is discovered, a more thorough investigation of the source area may be needed.

It is hoped that these comments will be useful to you. If you have any questions, please call me at (314) 751-3176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Glenn S. Golson
Environmental Specialist
Federal Facilities Section

GSG:al

c: Bob Koke, U.S. EPA, Region VII