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LETTER AND COMMENTS FROM MISSOURI DEPARTMENT OF NATURAL RESOURCES  
REGARDING DRAFT WORK PLAN AND QUALITY PROGRAM PLAN KANSAS CITY MO  
11/14/1995  
MISSOURI DEPARTMENT OF NATURAL RESOURCES

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCESDIVISION OF ENVIRONMENTAL QUALITY  
P.O. Box 170 Jefferson City, MO 65112-0170

November 14, 1995

Mr P. Mark Esch  
OL Q, AFBCA  
15471 Hangar Road  
Kansas City, MO 64147-1120RE: Review of *Draft Work Plan, Quality Program  
Plan, Delivery Order 0003*

Dear Mr. Esch:

I have completed my review of the subject documents and offer the following comments for your response.

**WORK PLAN**

Page 2, section 3.1, paragraph 1: Why was the MDNR Decision Matrix sheet used to determine cleanup levels when it applies to underground storage tanks? Please furnish the applicability of this matrix sheet and furnish the sheet itself that shows how the levels were calculated.

Page 2, section 3.1, paragraph 2: Where did the action levels stated here come from? UST guidance? Drinking Water Standards? Please furnish the applicable ARARs.

Page 4, section 3.4.4, paragraph 1: Will this subcontractor also be performing the work of closing the clovents at Site ST007?

Page 10, section 5.2.1, paragraph 2: MDNR Well Construction Rules require the casing be removed from the well, if possible, unless approved by the Division. Please adjust text or apply for Division approval to leave casing in place.

Page 10&11, section 5.2.2, paragraph 1: There is no existing landfarming facility on Base. If this refers to the POL Yard Project, the target cleanup levels proposed are not consistent with those agreed upon with AFBCA for characterization of the POL Yard. The method of remediation, if necessary for the POL Yard, has not been agreed upon. Please present another method for

method for disposal of contaminated soil. Please adjust sections 5.2.2.2 and 5.2.2.3 and any other sections that refer to the biocell that does not exist.

Page 13, section 5.2.2.5, paragraph 2: Please identify the source for backfill material. Please explain what quality control methods will be utilized to assure the backfill will not be contaminated.

Page 14, section 5.3.1.2, paragraph 1: The mention in this paragraph of the landfarm operation should be omitted due to the uncertainty of this project. Also, the effluent from the pond no longer flows through the oil water separator as stated here. Please adjust text.

Page 20, section 5.5: There is no existing on-base landfarming facility. Please delete this section.

Page 22, section 5.6.4.1, paragraph 1: I believe the text for this section and the following section are switched, because SS008 has no biovents and no monitoring wells. Please correct.

#### **FIELD SAMPLING PLAN**

General: Again, all references to the "existing" landfarming operation should be omitted from this document.

Page 2, section 2.0, paragraph 1: This is the first mention in either of these documents of the excavated area at SS008. What will be the horizontal and vertical extent of this excavation? What will be it's location? The second sentence in this section mentions the newly installed wells at SS008, page 10, section 5.2.2 of the work plan says " three groundwater monitoring wells, if warranted, will be installed". What warrants the installation of the three wells? Please clarify this discrepancy.

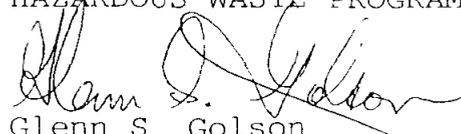
Page 3, section 2.1.1, paragraph 1: The proposed soil boring locations presented in Figure 2 appear to be directly on top of the existing biovents. These are not acceptable locations as they are not representative of the entire plume and the effect that bioventing has had on the contaminated area. A more logical approach would be to evaluate the original site characterization and place the borings in the areas of the highest contamination. MDNR would like to discuss the boring locations with A+BCA, before a final determination is made.

Page 4, section 2.2.1, paragraph 1: Please give the rationale used to pick the locations for the borings. MDNR would like to discuss the locations prior to concurrence.

Page 4, section 2.2.1, paragraph 2. The third sentence should probably be deleted.

If you have any questions, please contact me at (314) 751-3176.

Sincerely,  
HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "Glenn S. Golson". The signature is written in a cursive style with a large initial "G".

Glenn S. Golson  
Project Manager  
Federal Facilities Section

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c: Bob Koke-USEPA Region VII