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LETTER AND ADDITIONAL COMMENTS FROM MISSOURI DEPARTMENT OF NATURAL
RESOURCES REGARDING FINAL TECHNICAL REPORT PRELIMINARY
ASSESSMENT/SITE INSPECTION FOR SITE SS009 KANSAS CITY MO
11/21/1995
MISSOURI DEPARTMENT OF CONSERVATION

UEBL 93-0012
REPLY 1: 14 DEC 95
REPLY 2: 14 DEC 95
File: 17-A-23
P.C. 271

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STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

McGuintan Governor • David A. Shorr Director

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

November 21, 1995

Mr P. Mark Esch
OL Q, AFBCA
15471 Hangar Road
Kansas City, MO 64147-1120

RE: Final Technical Report PA/SI Site SS009

Dear Mr. Esch:

I have reviewed your responses to the MDNR comments expressed in my letter of October 11, 1995. I offer the following additional comments to your responses.

Response 2. (a.): I am sure that if you contacted numerous environmental specialists within the Air Force you would find that very few of them would share the same concerns over boring FSB8 sample results that MDNR does. MDNR is the regulatory agency that is tasked with oversight of Richards-Gebaur AFB, and is the Agency tasked with concurrence on the environmental condition of the property for transfer.

Response 2. (b.): See comment for Response 2. (a.) above.

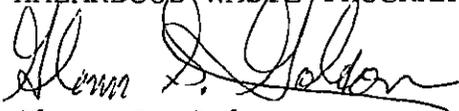
In a recent visit to the Base, a visual inspection of building 605 was conducted. This is the building directly adjacent to site SS009. It was noted that the electrical shop was close to this area and had a rear entrance near this site. Oil stains were observed around floor drains in the electrical shop, this was verified by the BEC. Historically, oil in electrical gear was contaminated with PCBs. None of the samples taken under this PA/SI were analyzed for PCBs. MDNR does not feel that PCBs have been adequately addressed at this site.

Soil samples were taken on the basis of PID screening. PCBs, a contaminant of concern, would not be identified by this method. In addition, samples taken from the 2.5 to 3 foot depth are not, by EPA guidance, acceptable for scoring surface soil pathways of contamination.

In summary, MDNR feels that this PA/SI report is not adequate because it does not address surface soil (0 to 2 feet) pathways of contamination. We doubt that HRS scoring is possible with the data given in this report.

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

Sincerely,
HAZARDOUS WASTE PROGRAM



Glenn S. Golson
Project Manager
Federal Facilities Section

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c: Bob Koke-USEPA Region VII
Federal Docket-USEPA Region VII