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LETTER AND ADDITIONAL COMMENTS FROM MISSOURI DEPARTMENT OF NATURAL
RESOURCES REGARDING REVISED DRAFT WORK PLAN AND QUALITY PROGRAM PLAN
KANSAS CITY MO
2/22/1996
MISSOURI DEPARTMENT OF NATURAL RESOURCES

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

February 22, 1996

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, Dated January 26, 1996

Dear Mr. Esch

We have reviewed your revised submittal of the subject documents and offer the following comments

General The plans still contain references to a TRPH method utilizing DRO (diesel range organics) and GRO (gasoline range organics). You have, by a separate letter, notified the State of your intent to utilize a different method to report TRPH. This method will need to be reviewed and approved by our Environmental Services Program(ESP) to insure that it meets regulatory reporting requirements

Please have your analytical laboratory contact Connie Van Dyke of MDNR's Environmental Services Program for written approval of the method you intend to use. Her telephone number is 573-526-3328

Page 5, section 3.4.4, and page 11, section 5.2.1, paragraph 2 Both sections reference closure or decommissioning of the biovents. The work executed under these sections must be performed by a well driller permitted by the State of Missouri. Please include a statement to this effect and ensure that the vents are closed by properly permitted personnel

Page 11, section 5.2.2, paragraph 2 and Section 5.2.2.2, paragraph 1 These sections reference a bioremediation landfarming facility. Section 3.8 of the Construction Quality Plan further states that the facility would be built by DO# 0004 (POL Yard remediation contract). Please note that MDNR will be issuing the new 1996 guidance for remediation of petroleum-contaminated soils in the next few weeks. The guidance is expected to recommend that soils be stockpiled for no more than 45 or 60 days

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If soils are to be treated in the POL bioremediation cell, the work plan should state that this is the case, and should describe the timing of the two projects to assure that excavation work on DO# 0003 does not proceed until the date of construction completion is known

Has a treatability study been conducted for the soils in ST007 and SS008? If so, that study should be available and referenced in section 2.3, Previous Investigations

Page 18, section 5.4.4 The last sentence specifies that the wash rack will be cleaned upon completion of the contract or within 90 days of use, whichever comes first. Section 5.6.2 on page 21 specifies that the wash rack will be cleaned upon completion of the project. The time line for cleaning the rack should be consistent in both sections

Page 21, section 5.6.2, paragraph 1 Will decontamination waste materials which have been characterized as non-hazardous also be disposed of at Essex Waste Management Services, or is this only for hazardous wastes?

The resignation of our former project manager for this site has caused some delays in our unit's reviews of submitted documents. I appreciate your patience and any assistance you have given us on background issues. Please contact me at (573) 751-3176 if you have any questions about this letter.

Sincerely,
HAZARDOUS WASTE PROGRAM



Kristine Davidson, Chief
DoD Unit
Federal Facilities Section

kd

c Bob Koke-USEPA Region VII
Diana Travis, DGLS