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MINUTES FOR BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING HELD 4  
SEPTEMBER 1997 KANSAS CITY MO  
9/29/1997  
CCI

Sept. 29, 1997

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Meeting Minutes of the BRAC Cleanup Team Meeting

Place: 15471 Hangar Road, Kansas City, Missouri

Date: Thursday, Sept. 4, 1997

Attending:

William L. Harris, Ph.D., P.E.

Robert Koke, EPA Region 7

Guy Frazier, MDNR

Don Kerns, MDNR

Robert Lodato, AFBCA, OLQ

Garey Reeves, Site Manager

Bob Zuiss, AFBCA, OLQ

John Fringer, AFBCA

Fred Waterman, AFCEE/ERB

Kay Grosinske, AFCEE/ERB

Syd Courson, CCI

AGENDA ITEMS

(Bold face highlights decisions, action items, persons responsible and due dates.)

Item 1 (Approval of minutes of July 15, 1997, meeting)

Robert Lodato of the OLQ stated they would revise the minutes to incorporate some non-substantive language changes. He said the revised minutes would be forwarded to MDNR and EPA for review and approval with the Sept. 4 minutes.

Item 2 (Technical Assistance Visit Team Review)

Garey Reeves of the OLQ introduced Dr. William Harris. Harris is a former BEC who now is with The Texas Center for Applied Technology in San Antonio, Texas. The purpose of the TAV was to pinpoint any roadblocks that were impeding efforts to reach closure, and to make recommendations on how the process at R-G could be moved along.

Page 2. BCT (9-04-97)

Dr. Harris explained that the TAV was set up to evaluate the ability of each OLQ to meet its "last remedial-action-in-place (LRAIP) date."

Harris said one of the main focuses of the operation was data collection for a long-term repository so that when an OLQ shuts down there is a central data base. A second purpose was to evaluate the existing programs. Does the OL have a realistic attempt at making the last remedial-action-in-place date using current strategy?

He said in the case of Richards-Gebaur, and in discussions with the OLQ, there was some real concern about cleanup levels. To that end, he said the TAV recommended the AFBCA meet with the MDNR and EPA to establish strategies and methodology.

John Fringer of the AFBCA said the Air Force felt that the meeting was necessary to determine the essential strategy for establishment of cleanup levels. He said the Air Force also believed the meeting should include attorneys and risk assessors from the Air Force and MDNR. He said there is not a clear understanding of what is a legally defensible, scientifically-based strategy for establishing cleanup levels.

Harris explained that two areas should be examined: statutory clean-up levels and risk-based levels. If risk-based levels are to be established, he said the AFBCA needs to know what mechanisms and process is acceptable to the state for establishing the levels.

The Air Force said the purpose of having attorneys present is to help in establishing the ARARs that might be applicable

Kerns of MDNR asked which ARARs would be followed and Harris replied, "That's what we want to establish."

Bob Koke of EPA asked if would be more appropriate for the Air Force to do risk calculation and then present it to the state.

Harris replied that there is not a disagreement that the Air Force needs to do the risk assessment and provide the numbers to EPA and MDNR. He said the Air Force just wants to make sure that everyone concurs with the methodology. The Air Force wants to know that once the process is established all the parties can live with it. He said the meeting with risk assessors would be to make sure everybody agrees with the methodology used prior to the establishment of levels.

Page 3. BCT (9-04-97)

Koke had concerns that many people feel mixing attorneys with technical people is very intimidating and that it might not be very productive. He suggested the technical experts meet first, reach a consensus and then present it to the lawyers. He added that EPA might want its lawyers there, since it could have impact on other projects.

Kerns of MDNR pointed out that MDNR does not have risk assessors. He said that the Missouri Department of Health has risk assessors, but that their concerns are only human health and do not address other, environmental factors. Kerns also said he didn't know how the Air Force was going to be able to convince MDNR without meaningful data.

Harris said it is very difficult to wait until you have data to decide if you have a problem.

Kerns said that is the reason you collect data -- to see if there is a problem

Harris replied that the idea is to have established criteria for determining levels. He said if you go into the field with established criteria, and if a particular chemical level is higher than the level determined to be safe, then the Air Force has to do more work. If the level is below that, then nothing more has to be done.

Koke said he could not understand why the attorneys would try to debate a technical issue and determine if it meets the law or not. From the EPA perspective, he added, he probably would look at the whole country and if EPA saw that Missouri's cleanup levels were lower than most, the EPA probably would wonder why.

Harris said he would recommend to the AFBCA "that we first meet with the attorneys and see if they feel they need to be involved at this point or later."

Fringer said the attorneys may not be needed but that the Air Force just wants to make sure that when it develops its strategy it meets the legal requirement for establishing cleanup levels protective of human health and the environment.

Kerns responded that the MDNR had already provided its cleanup levels and they were not going to change. He said if the Air Force wants to do a risk assessment and send something else for review the state is "more than willing to look at that."

The meeting facilitator asked Kerns if the MDNR has provided all pertinent levels to the OLQ. He asked if there are any levels that have not been provided.

Kerns said levels for all contaminants of concern have been provided

Page 4. BCT (9-04-97)

Frazier said his agency sent OLQ a letter with cleanup levels for the POL Yard because that was all the OLQ requested. He said the levels apply to the whole base, and they were based on a consensus of expert opinion of experienced professionals in MDNR.

Harris pointed out that from a risk assessor's standpoint, the chemical is often not the issue as much as what the methodology is. Once the methodology is known, Harris said you can plug any chemical in there and come up with a proposed level.

Frazier said the main stumbling block is TPH. He said the Air Force agreed to 500 ppm initially, but has since proposed to increase the level to 2500 ppm. Frazier said MDNR can't go any higher than 500 ppm, and that some MDNR experts were concerned that even that level may be too high.

Harris said the purpose of the meeting is focus on this one issue -- to understand where the cleanup levels are coming from. He said, "Then we can focus on the real issue: What do we have to do to meet all the requirements to close out all the sites here."

**The Air Force, MDNR and EPA agreed that a meeting of the technical experts could produce results. Harris will recommend that the Air Force ask its lawyers if they felt they should be involved at the initial meeting or at a later stage. No timetable was set for the Air Force to act on Harris' recommendation.**

Harris also presented a new proposed plan and timeline (see attachments) for remedial actions and closure. He said the TAV team was told the state was concerned about whether the Air Force was following the CERCLA process, and so his team decided to go back to the basics.

He proposed a plan that he said has built-in flexibility. He said the base currently is considered as one operable unit. He proposed dividing the projects into three Operable Units:

**OPERABLE UNIT 1 (No Further Action OU):**

OUI includes seven IRP sites and four Areas of Concern. The OLQ had submitted 14 NFRAPs to MDNR on November 13, 1996. MDNR informed the OLQ earlier this year that there was insufficient documentation furnished for the state to act on. The OLQ withdrew the NFRAPs and agreed to work with the state to come up with a model NFRAP that would have all of the material the state needs in order to review.

Page 5. BCT (9-04-97)

Fred Waterman said he had revised two of the 14 NFRAPs to include what he understood the MDNR was looking for. He said he submitted them to the OLQ a couple of months ago and asked if MDNR had seen them.

Frazier said no, and Lodato said he had not yet sent them to MDNR.

Kerns said, "To get this started, get the NFRAPs to us to see if we have any concerns. If we do, then we kick it into OU2." (OU3 if it only involves ground water)

#### OPERABLE UNIT 2

OU2 includes soil contamination at POL Yard and Fuel Hydrant Line, Industrial Waste Line, ST007, stressed vegetation and steamline bleeder release.

#### OPERABLE UNIT 3

OU3 includes limited, site-specific groundwater.

Harris pointed out that his team had information that MDNR had concurred that the soil didn't appear to present a major problem, but it was not convinced that the ground water had been adequately addressed. Harris said the OU3 involves limited ground water associated with specific sites, not basewide. He said that was not the objective. Kerns replied, "Nor ours."

**MDNR, EPA and Air Force agreed to the proposed plan, and agreed that if MDNR required additional documentation on any NFRAP it would be rolled into OU2, or OU3 if ground water is involved.**

Harris noted that a formal Record of Decision would not be required if the summarizing documentation accompanying each NFRAP was satisfactory to MDNR. He said this would be preferable because of the level of signature authority often required for most RODs. Koke said he believed a ROD provided greater sense of security if, 10 years down the road, someone questioned a decision. **No agreement was reached on what type of decision document would be required.**

During the discussion of the plan, Kerns pointed out that before MDNR can take further action on anything his department must have its business plan in place and the DSMOA waiver must be addressed so MDNR will have the financing to proceed.

Page 6. BCT (9-04-97)

## TIME TABLE

Harris said he built in 180 working days for investigation, which is more than ample. But he said he was proposing only 20 working days for MDNR to review, which he acknowledged was aggressive. He said he understood the need for a lengthy review of a draft document, but that review of a draft final should be fairly fast, since it would show how MDNR's concerns about the initial draft were addressed.

Kerns agreed that the draft final should have MDNR's comments incorporated, but he still questioned the timeline, pointing out that he plans for 30-60 calendar days for review.

Harris said the Air Force has not signed off on the proposed plan, either. He said it was merely an estimate and the types of dates "you would be looking at if you started from scratch," adding that the work done at R-G was well beyond the "scratch" position.

Frazier said this would set MDNR back because its DSMOA business plan was based on a similar estimate, and there have been a lot of costs associated with those efforts to date.

Reeves replied that, "We will support your current estimate on that. We're not going to go back and ask you to reinvent the wheel. We're only going to pay you for what services you provide, and therefore the money, the pot, is going to be there. But you'll get reimbursed. We're not going to go back and revisit this. We're going to press on, on the basis of what you've already done."

Kerns responded, "I don't think we have a problem with it. I prefer to do what Garey said. Let's not go back and revisit it. It takes a tremendous amount of time."

**OLQ and MDNR agreed to be aggressive about trying to move the proposed time table back from a FY2001 LRAIP date.**

Harris also brought up the subject of USTs, saying that the Air Force took them out of the ground and took remedial actions, but did not receive any correspondence from MDNR approving closure.

Kerns responded that sometimes you haven't gotten anything back because it wasn't really a UST site. He said just because there's a tank in the ground doesn't make it a UST, because it might have been used for something else.

**OLQ and MDNR agreed to meet along with the state's UST section to determine the status of UST sites and the procedures and documents necessary for closure.**

Page 7. BCT (9-04-97)

At the conclusion of Harris' presentation, Kerns commended him for his work, and said he thinks this is a good first step.

**Item 3 (Radiation Survey)**

Lodato said the survey was completed through the Brooks AFB and Armstrong's labs on July 5-7. The report is expected late September, early October.

**Item 4 (Status IRP Site XO001 -- Geophysical Team Survey)**

VERSAR completed the field investigation on June 19-20. Eleven soils samples and three water samples were collected. The OL has the draft technical report and it is under review. When the Air Force has completed its internal review it will send the report to MDNR and EPA.

**Item 5 (Quarterly AFBCA Budget Review)**

Lodato said BCT members have been invited to participate in the quarterly review and in a training conference in Springfield, Va. Oct. 7-8-9.

**Item 6 (New Business/Comments)**

Reeves brought up the DSMOA training in Denver Sept. 16-17-18 and asked who would be attending. OLQ will be sending Lodato, Zuiss and Reeves. Frazier, Kerns and one other person will be representing MDNR.

Reeves revisited the Operable Unit plan to make the following points.

a. Anything we have that does not require further action will be placed in OU1. The Air Force will readdress its NFRAPs and send them to MDNR to see if they meet requirements. If they do, they will be listed in OU1. If there is a problem that can be fixed quickly, it will be fixed and then placed in OU1. If there is one involving soils that requires further action, it will be rolled into OU2, and if it involves ground water it will be moved to OU3. EPA and MDNR agreed.

b. OU2 will address soils only. OLQ inadvertently listed IRP Site XO001 as a NFRAP in the briefing. Further cleanup is required so it is being rolled into OU2. EPA and MDNR agreed.

c. OU3 will address site-specific ground water. OLQ will look at ground water at any specific site with which MDNR has concerns. EPA and MDNR agreed.

Page 8. BCT (9-04-97)

**Item 7 (October BCT/RAB Meetings)**

BCT agreed to adhere to a set meeting schedule starting in October. BCT meetings will be the first Thursday of each month.

**October BCT meeting will be 1 p.m. Oct. 2 (Thursday) in the OL Conference Room.**

**October RAB meeting will be 7 p.m. Oct. 2, in the RG Military Club.**

BCT Meeting Adjourned.

Minutes compiled and submitted by

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Syd Courson

Facilitator

CCI Public Relations and Marketing Communications, Inc.

**BCT PROJECT TEAM MINUTES**

Sept. 4, 1997

10:00 a.m., AFBCA Conference Room, Building 926

M	TOPIC	DESIRED OUTCOME	RESPONSIBLE PERSON	ACTION
	Review Minutes	Approval	OLQ	OL said he wanted to make some non-substantive revisions before minutes were approved. Revised minutes will be sent to MDNR and EPA.
	Technical Assistance Visit Team Review	BCT concurrence and signing of Final Draft of Master Integrated Environmental Program Schedule (MIEPS)	William Harris, Ph.D, P.E.	Dr. Harris outlined a two-part plan designed to streamline the closure process. The first phase involves a meeting of Air Force, EPA and MDNR to set strategies and methodology for establishing cleanup levels. Air Force insisted on having its lawyers present. MDNR and EPA balked and Harris said he would recommend to AFBCA that it ask its lawyers if they need to be involved in this step. <b>No Timetable was set for this meeting.</b> The second phase sets up three operable units, one for all projects ready for NFRAP, one for sites where additional soil work must be done, and the third for where additional remedial work is required regarding ground water.

Radiation Survey	Base Survey	OLQ	Survey was completed July 5-7. Report is due in late September-early October.
Status of IRP Site XO001 (Geophysical Team Survey)	PA-SI Completion	OLQ	VERSAR completed field inspection in June. Additional soil and water samples were taken. OLQ has draft technical report and will send it to MDNR and EPA when OLQ internal review is completed.
Oct 7 Quarterly AFBCA Budget Meeting and 2-day Training Session	Attendance by BCT members	OLQ	MDNR and EPA indicated interest in attending.
New Business - Comments		BCT	Site Manager Gary Reeves discussed the DSMOA training session in Denver Sept. 16-18 and asked who would be attending. OLQ will send Lodato, Zuiss and Reeves. Frazier, Kerns and one other attendee will represent MDNR.
October BCT and RAB Meetings	Schedule	OLQ	BCT agreed to establish a standard meeting date for BCTs on the first Thursday of each month. Next BCT meeting: 10 a.m., Oct. 2 in the OL Conference room. The next RAB meeting will be Oct. 2 at 7 p.m. in the RG Military Club.

**BCT PROJECT TEAM AGENDA MINUTES**  
**Sept. 4, 1997**  
**10:00 a.m., AFBCA Conference Room, Building 926**

ITEM	TOPIC	DESIRED OUTCOME	RESPONSIBLE PERSON
1	Review Minutes	Approval	OLQ
2	Long-term Lease Status	Clarification of KCAD-Rail Terminal Issue	OLQ
3			
4			
5	OLQ Business Plan/Priorities List	Update on Schedule for OLQ/MDNR Actions	OLQ/MDNR
6	Status of IRP Site XO001 (Geophysical Team Field Sampling)	PA-SI Completion	OLQ
7	Status of AOC Fuel Hydrant Line Closure	Approval of Remediation Work Plan and Agreement on Model NFRAP Document	OLQ/MDNR
8	Status of IRP Site ST007 (Leaking USTs)	Remediation Work Plan Approval	MDNR
9	Radiation Survey Update	Base Survey	OLQ
10	New Business - Comments		
11	October BCT and RAB Meetings	Schedule	OLQ

# **Richards-Gebaur BCT September 1997**

- **Strategy meeting for the development of procedures to establish clean-up levels**
- **Proposed new Operable Units for the IRP**
- **Proposed new schedule for the remaining IRP**
- **Proposed plan of action to clear all UST sites**

# Proposed Operable Units

- Existing program consists of one OU
  - Basewide operable unit/independent sites
  
- Proposed Three Operable Units
  - OU-1 No Further Action OU
    - » 7 IRP Sites
      - XO-001 Belton Training Complex
      - FT-002 North Burn Pit
      - SS-003 Oil Saturated Area
      - SS-004 Hazardous Waste Drum Storage
      - SS-006 Hazardous Material Storage (927)
      - SS-008 Test Cell Area
      - SS-009 Fire Valve Area

# Proposed Operable Units Cont.

- OU-1 Cont.
  - » 4 Areas of Concern
    - drainage pond
    - firing range
    - bldg 918 parking lot
    - central drainage
  
- OU-2
  - » ST-005 POL and Fuel Hydrant Line
  - » ST-007 Leaking USTs
  - » Industrial waste line
  - » Oil/Water Separators
  - » Areas of Concern
    - Stress vegetation Bldg 603
    - Stress vegetation Bldg 918
    - Steamline Bleeder Release

# **Proposed Operable Units Cont.**

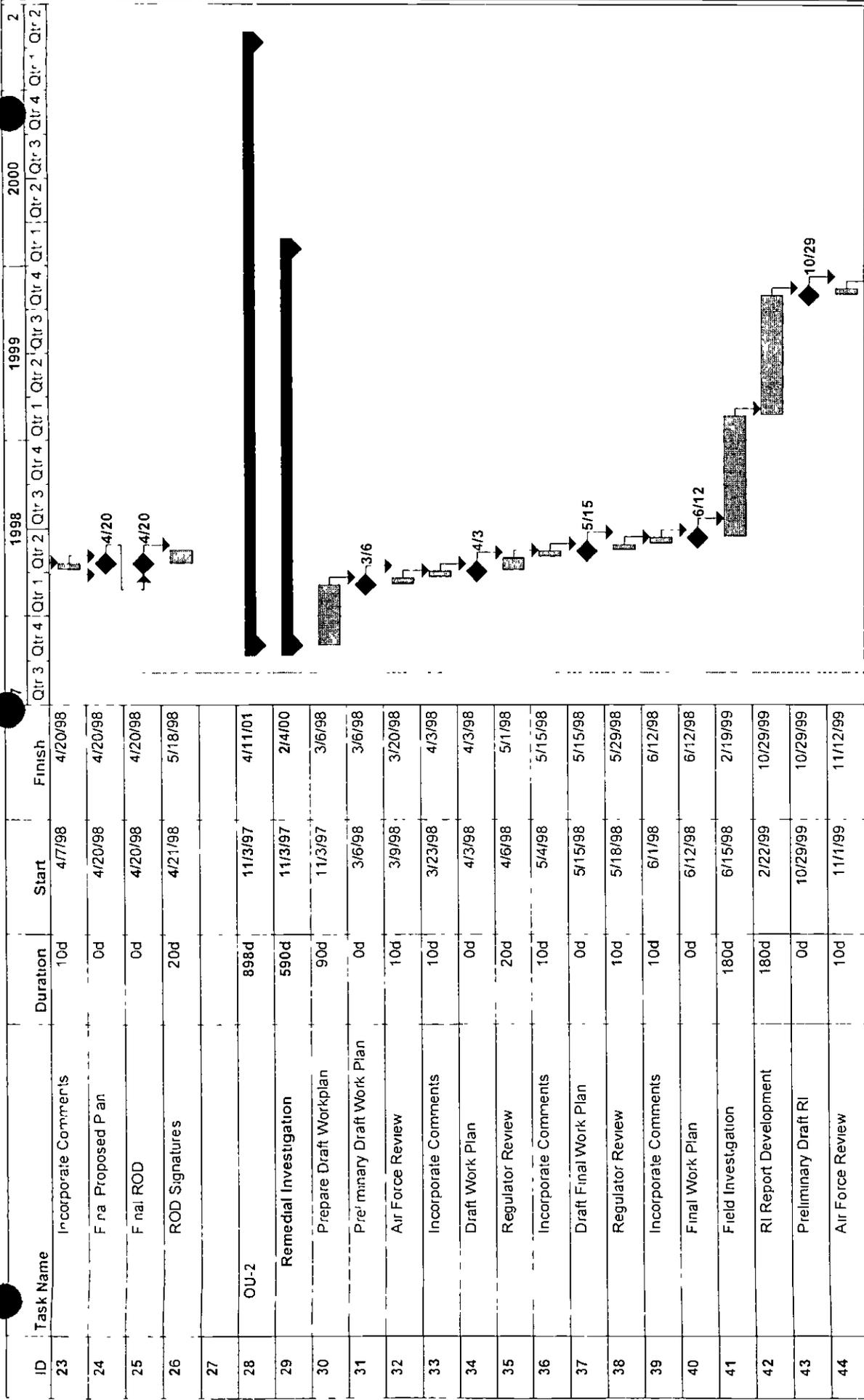
**- OU-3**

**» Limited Groundwater, Site Specific**

# Underground Storage Tanks

- **Determine Closure Status on all Tanks**
  - Site Investigation Report, 20 tanks
- **Meet with MDNR UST section to determine tanks needing closure**
- **Review closure reports and update for filing**
- **Strategy meeting for the development of procedures to establish clean-up levels**





ID	Task Name	Duration	Start	Finish
23	Incorporate Comments	10d	4/7/98	4/20/98
24	F na Proposed Pan	0d	4/20/98	4/20/98
25	F nal ROD	0d	4/20/98	4/20/98
26	ROD Signatures	20d	4/21/98	5/18/98
27				
28	OU-2	898d	11/3/97	4/11/01
29	Remedial Investigation	590d	11/3/97	2/4/00
30	Prepare Draft Workplan	90d	11/3/97	3/6/98
31	Pre'inary Draft Work Plan	0d	3/6/98	3/6/98
32	Air Force Review	10d	3/9/98	3/20/98
33	Incorporate Comments	10d	3/23/98	4/3/98
34	Draft Work Plan	0d	4/3/98	4/3/98
35	Regulator Review	20d	4/6/98	5/1/98
36	Incorporate Comments	10d	5/4/98	5/15/98
37	Draft Final Work Plan	0d	5/15/98	5/15/98
38	Regulator Review	10d	5/18/98	5/29/98
39	Incorporate Comments	10d	6/1/98	6/12/98
40	Final Work Plan	0d	6/12/98	6/12/98
41	Field Investigation	180d	6/15/98	2/19/99
42	RI Report Development	180d	2/22/99	10/29/99
43	Preliminary Draft RI	0d	10/29/99	10/29/99
44	Air Force Review	10d	11/1/99	11/12/99

Project Richards-Gebaur IRP Sched  
Date 9/4/97

Task: [Bar] Summary: [Bar]

Progress: [Bar] Rolled Up Task: [Bar]

Milestone: [Diamond] Rolled Up Milestone: [Diamond]

Rolled Up Progress: [Bar]

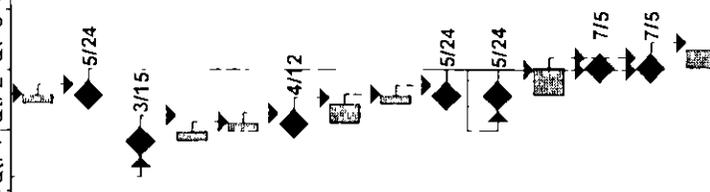








ID	Task Name	Duration	Start	Finish	Year												
					1997	1998				1999				2000			
					Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	
133	Incorporate Comments	10d	5/11/00	5/24/00													
134	Draft Final PP	0d	5/24/00	5/24/00													
135	Internal Draft ROD	0d	3/15/00	3/15/00													
136	Air Force Review	10d	3/16/00	3/29/00													
137	Incorporate Comments	10d	3/30/00	4/12/00													
138	Draft ROD	0d	4/12/00	4/12/00													
139	Regulator Review	20d	4/13/00	5/10/00													
140	Incorporate Comments	10d	5/11/00	5/24/00													
141	Draft Final ROD	0d	5/24/00	5/24/00													
142	Public Meeting	0d	5/24/00	5/24/00													
143	Comment Period	30d	5/25/00	7/5/00													
144	Final PP	0d	7/5/00	7/5/00													
145	Final ROD	0d	7/5/00	7/5/00													
146	ROD Signatures	20d	7/6/00	8/2/00													



Summary  
 Rolled Up Progress  
 Rolled Up Task  
 Rolled Up Milestone

Project Richards-Cebaur IRP Sched  
Date 9/4/97