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MINUTES FOR BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING HELD 2
FEBRUARY 1998 KANSAS CITY MO
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DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

Feb. 20, 1998

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Meeting Minutes of the Richards-Gebaur BCT

Place: Missouri Department of Natural Resources
Jefferson City, Mo.

Date: Monday, Feb. 2, 1998

Attending:

Peter Barrett, CH2MHILL
John Fringer, BEC
Guy Frazier, MDNR
Alan Friedstrom, AFBCA/DB
Robert Geller, MDNR
Kay Grosinske, AFCEE/ERB
Don Kerns, MDNR
Robert Koke, EPA Region 7
Garey Reeves, OLQ
Bob Zuiss, OLQ
Syd Courson, CCI

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AGENDA ITEMS

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

Item 1 (Approval of January 1998 Minutes)

Approval was deferred to give BCT members additional time for review. **Action is scheduled for the March BCT meeting.**

Item 2 (Draft NFRAP Format)

Peter Barrett of CH2MHILL, the contractor hired by the Air Force to perform the Evaluation and Consolidation efforts, distributed copies of the draft NFRAP (See Attachment 1) that he proposed be used by the BCT to create authoritative, documented rationales for closing out Areas of Concern, Compliance Sites and IRP Sites.

He said the draft closely follows the NFRAP guide published by the Air Force in June 1995.

He said the declaration, decision and responsiveness summaries recommended in the NFRAP Guide seemed to be good models. He said the summaries will: address each site, identify it appropriately, discuss what chemicals or hazardous materials, if any, were found at the site, detail what steps, if any, were taken to remediate the site, and reference documents that support the findings and actions.

Barrett said the meat of the draft NFRAP is in the decision summary. He said CH2MHILL staff is at Richards-Gebaur, going through all available records to help it describe the site, adjacent land uses, and to identify sensitive populations within a two to three mile radius. CH2MHILL is looking at water use within that radius, and into the site history to determine remedial action, milestone points, and significant reviews and comments from appropriate agencies.

He said that to make sure the NFRAP document can stand alone, it will describe the site setting, define it, discuss the geology and hydrology, and provide a summary of chemicals of concern, as well as consider the population that would have the potential of being exposed. To provide the proper context, CH2MHILL will identify the ARARs that should be considered. He said that the majority of the sites will involve chemicals, but the NFRAP also would address location-specific areas such as wetlands and also technological-based ARARs.

Barrett discussed risk characterization and described four NFRAP decision categories. Category I requires a qualitative assessment; Category II requires a semi-quantitative assessment; Category III requires a quantitative assessment; Category IV requires remediation.

Category I includes cases where it is determined from a review of the documents that no chemical or hazardous material has been stored or released at the site. An example would be an Area Of Concern where there was a suspicion of contamination that proved unfounded.

Category II includes cases where it is determined that a site does have chemicals and hazardous materials, but the amount is below risk-screening levels (10^{-6}).

Category III and Category IV involve sites that definitely have chemical or hazardous materials and where expanded site inspection and additional sampling find screening levels of between 10^{-6} and 10^{-4} . Barrett said if the agencies agree that the specific site is below action levels, then it is treated as a Category III NFRAP. But if it exceeds action levels it moves into Category IV after appropriate remedial action.

Barrett restated that the first three categories do not require any remediation. They require investigations. Remedial action is required before a site is moved into Category IV.

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Guy Frazier of MDNR asked if this makes AOCs subject to NFRAPs, even though the BCT had agreed (at the November 1997 BCT meeting) that AOCs would simply drop off the site list if there was no contamination. Barrett said that under the Air Force 1995 Guide the AOCs would require NFRAPs.

The facilitator suggested that since the BCT members more or less agreed that there was no contamination at certain AOCs involving stressed vegetation, NFRAPs for those sites would be a good test or pilot to see how well the system works.

Grosinske objected to any additional "test" or "pilot," and the facilitator restated his suggestion, saying that he meant it as a test of how well the BCT members could work together. He said if the members could agree on getting insignificant sites to NFRAP status, it could set the tone for cooperating on other, more significant sites. She also said the plan is for all of the NFRAPs to be submitted at one time.

Fringer objected to using the NFRAP process for AOCs, pointing out that the BCT earlier had decided it was not necessary, but Barrett said that, under the 1995 Guide, AOCs require NFRAPs.

Reeves and Frazier agreed that it would be useful to get the simple sites out of the way. Reeves asked that CH2MHILL identify the easiest NFRAPs and submit them first, letting the difficult ones come later. Frazier agreed, saying that if those were out of the way the deck would be cleared to work on the others when they came in.

Grosinske said there was no funding in the Evaluation and Consolidation contract to cover NFRAPs on AOC sites, but that they could be done by the Air Force. Reeves pointed out that who will do the NFRAPs is an internal issue for the Air Force, and need not take up the BCT's time.

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Alan Friedstrom, AFBCA, said there is nothing to prevent closing multiple sites in a single NFRAP, saying that he had used that method at another Air Force base. Frazier agreed that the stressed vegetation AOCs, along with the Steamline Bleeder Release, could be rolled into a single NFRAP. **The BCT agreed to place AOC-009 (Steamline Bleeder Release), and AOCs 004 and 005 (Stressed Vegetation around Buildings 603 and 918) into a single stand-alone NFRAP.**

Kerns asked how many NFRAPs are contemplated. Grosinske said it was uncertain at this time. She said there are 19 sites (excluding AOCs 004-005-009)

Comments on the draft NFRAP document submitted at the meeting by CH2MHILL are due at the March BCT meeting. CH2MHILL will have a list of ARARs to present at the March meeting, with comments due at the April BCT meeting.

Kerns asked about ARARs in the draft NFRAP document, and Barrett said they were addressed in Sec. 2.3 Barrett said each category of NFRAP decision will have pertinent ARARs, and not all ARARs will apply to all categories.

Item 3 (POL Yard Status)

Kerns said that preliminarily it is a UST, but he said the MDNR's UST section has not responded by letter. **Kerns said a reply should be ready at least by the March BCT meeting.**

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Item 4 (Evaluation & Consolidation Status)

Grosinske and Barrett said work is progressing, including the search for data gaps and data needs. Barrett said his staff has been at R-G for about a week, going through the administrative records and site reports, and that about 90 percent of that work is complete. He said this week CH2MHILL will begin summarizing the data and the technical conclusions that have been drawn, with an aim toward placing as many of the sites as possible into one of the NFRAP categories and to complete the NFRAP decision documents.

Item 5 (Radiation Survey)

Frazier said he had some preliminary comments but nothing formal yet.

Bob Geller asked Frazier if he had found anything that the Air Force ought to know in the interim. Frazier said the sampling results showed that background levels were significantly higher than the sampling of the buildings themselves. He said that indicated the sampling might not have been correctly. He said it doesn't make sense for background readings taken outside the buildings to be much higher (sometimes as much as 10 times) than the readings inside the buildings.

Frazier said he will send his written comments to the Air Force as soon as he refines it, so it can be discussed at the March BCT meeting.

Item 6 (OL Phasedown Status)

Reeves said he hopes to have the Regional OL team make a presentation at the April RAB meeting to inform the community about the status of the R-G OL close-down and how the remainder of the base closure will be handled.

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Item 7 (OWS 965)

Zuiss said the sampling was done as scheduled on Jan. 15, and the sampling results have not arrived. Zuiss noted that an MDNR staff member was present for the sampling and received split samples. Zuiss said the MDNR staff member called the facility a clarifier rather than a separator because it was designed to separate solids out rather than lighter than water type elements.

Item 8 (New-Old Business/Comments)

Grosinske said the work plan is done. **Copies will be circulated as soon as possible.** Kerns asked if he could also have copies of the Air Force NFRAP Guide that Barrett used as a model. **The Air Force said it would supply copies as soon as possible.**

Fringer asked if the next BCT meeting, scheduled Thursday, March 5, could be moved to Wednesday, March 4, because of a conflict with a graduate course he takes. The BCT normally meets on the first Thursday of each month, but Fringer asked if that could be changed, to perhaps the first Tuesday. The facilitator reminded the BCT that the regular meeting schedule (first Thursday of each month) was adopted because last year the meeting dates were being changed constantly, resulting in some months without meetings. The facilitator said if no one had any objection and Fringer had a genuine problem, the meeting date can be changed, but "we can't keep changing every month, because we'll be right back where we were last year, when we would change at the drop of a hat."

Reeves pointed out that the RAB meetings usually occur the night of the BCT meeting, and the facilitator said in fairness to the RAB members they certainly should be consulted before any permanent changes are made that affect them.

The BCT agreed to change the March meeting to March 4, and the April 2 BCT and RAB meetings will remain on April 2.

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Item 9 (March BCT Agenda -- Tentative: additional items may be added)

Draft NFRAP Document Discussion

ARARs Submission

POL Yard Status

Radiation Survey Report

OWS 965 Sampling

Evaluation & Consolidation Status

OL Phasedown Status report

Meeting Adjourned

Minutes compiled and submitted by:


Syd Courson, CCI

Attachments:

1. Revised December 1997 Minutes
2. NFRAP Document Format Draft

BCT PROJECT TEAM MEETING MINUTES ABSTRACT

2 February, 1998

2:30 p.m., MDNR Headquarters-Jefferson City, Mo.

ITEM	TOPIC	DESIRED OUTCOME	RESPONSIBLE PERSON	ACTION
1	Review of January Minutes	Approval	BCT	Deferred until March Meeting
2	Draft NFRAP Format	Agreement	AFCEE/CH2MHILL	BCT agreed to place AOCs 009, 004 and 005 into a single stand-alone NFRAP. Comments on the draft NFRAP document submitted by CH2MHILL are due at the March 4 BCT meeting. CH2MHILL will submit a list of ARARs at the March 4 meeting, with comments due at the April 2 BCT meeting.
3	POL Yard Status	Determination whether MDNR considers it a UST Site	MDNR	MDNR said a reply should be ready at least by the March BCT meeting.
4	Evaluation & Consolidation Status	Progress Report	AFCEE/CH2MHILL	CH2MHILL is summarizing the data and the technical conclusions it has gathered.
5	Radiation Survey	Comments by MDNR on Air Force report concerning sites with potential for Air Force-caused radiation contamination	MDNR	MDNR said it will send its written comments to the Air Force as soon as the survey report has been reviewed fully, so it can be discussed at the March BCT meeting.
6	OL Phasedown Status	Informational	AFBCA Site Manager	No action
7	OWS 965	Discussion of the results of Jan. 15 sampling	BCT	No action
8	Old/New Business/Comments			The Air Force will circulate copies of the just completed work plan as soon as possible, as well as copies of the AF NFRAP Guide. The BCT agreed to change the date for the March BCT meeting from March 5 to March 4.

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