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MINUTES FOR BASE REALIGNMENT AND CLOSURE CLEANUP TEAM MEETING HELD 2
APRIL 1998 KANSAS CITY MO
4/21/1998
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DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

April 21, 1998

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Meeting Minutes of the Richards-Gebaur BCT

PLACE: 15471 Hangar Road, Kansas City, Missouri

DATE: Thursday, April 2, 1998

Attending:

Peter Barrett, CH2MHILL

Dale Cira, CH2MHILL

John Fringer, BEC

Guy Frazier, MDNR

Alan Friedstrom, AFBCA/DB

Kay Grosinske, AFCEE/ERB

Don Kerns, MDNR

Robert Koke, EPA Region 7

Bob Zuiss, OLQ

Syd Courson, CCI

AGENDA ITEMS

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

Note: Agenda items are listed numerically, except item 6, which was discussed at the beginning of the meeting because WPI contractor Monica Rakovan was only available for a telephone conference call at 9:30 a m.

Item 6. (Plans for registering and closing USTs on AF property)

WPI contractor Monica Rakovan joined the meeting by telephone to report that she had researched the underground storage tanks that had been on the Richards-Gebaur property now under AFBCA purview. She earlier had delivered to the Air Force a list of 43 registered and unregistered USTs. She noted in the list that 38 have been removed, including 15 that were removed prior to Dec. 22, 1988, the date at which new federal regulations governing UST removal became effective. The list said 12 of the USTs that were removed had been closed properly with MDNR concurrence, and that another tank

that had been closed but not removed also had closure concurrence from MDNR. According to the list, 34 of the 43 USTs were not registered with MDNR (including some that had been closed with MDNR concurrence).

In response to BEC John Fringer's questions about her next steps, Rakovan said the first step is to get MDNR's statement that it believes the best way to proceed is for the Air Force to register all of the unregistered tanks. She said once that is accomplished, she would go to Jefferson City to work with MDNR to determine the process and the length of time for registration to be completed.

Don Kerns of MDNR said that any tanks on the Rakovan list that were not classified USTs would come under MDNR purview, and Fringer agreed.

Rakovan said she could begin the process the week of April 13 by visiting Richards-Gebaur and Jefferson City to work on the registration forms, and then hand-deliver the documents to MDNR. Guy Frazier of MDNR asked Fringer first to send a letter to Fred Hudson of the MDNR UST Program, explaining the process the Air Force wishes to use, to make sure the USDT Program will allow the Air Force to do that. She said she and Hudson talked last week and she explained what the Air Force had in mind. She said Hudson seemed agreeable but he did not say formally the plan would be accepted. Fringer said he would write the letter to Frazier/Hudson as soon as possible.

Item 1 (Approval of March 1998 BCT Minutes)

Fringer requested the 4th paragraph under the ECS Work Plan be clarified to read as follows (underlined, bold-faced words show original language, italicized, bold-faced words show new language):

Frazier asked if there is any possibility of recommending long-term monitoring as part of a remediation. Cira said that would be considered if it were deemed appropriate, and that he did not want to close the door on any potential option. Frazier said he agreed with that, but that the Air Force seems focused on NFRAPs to the point that, "in my mind, potentially, you've already closed the door." Cira replied, "We're not trying to close the door on anything." He said the desired result is to transfer the property with minimal disruption, and be able to manage it the closure so that future property owners or users don't have to deal with it environmental liability.

Fringer also questioned the schedule of activities in the work plan that called for the first of the draft NFRAPs to be mailed by the Air Force to MDNR and EPA by April 13, with EPA and MDNR comment due May 25. Fringer said the situation had changed and the dates were inoperative. Kerns he could not approve the minutes with those dates. The facilitator pointed out that the dates were accurate at the time of the March BCT meeting and could not be changed. The facilitator said the April minutes could reflect this change, and the BCT members agreed. The changes are that Draft NFRAPs will be

mailed to all parties the week of April 13. Comments from MDNR and EPA will be due 60 calendar days after receipt of NFRAPs.

Kerns objected to some of the ARARs comments by Dale Cira and Peter Barrett of CH2MHILL during their March presentation, when Kerns was absent. Kerns said he wanted it to be known that MDNR may or may not agree with some of the statements (about ARARs). The facilitator pointed out that the minutes factually reflected the presentation, and this was not a matter for correction. Kerns said he was not trying to correct anything, but wanted his comments included in the current (April) BCT meeting minutes. He specifically referred to the last three paragraphs on page 3 of the March minutes; the first two paragraphs on page 4, the last paragraph on page 7 and the first paragraph on page 8.

The March BCT minutes were approved, with Fringer's clarifying changes

Item 2. (Summary of the March 24-25 partnering meeting)

Kerns said he felt the group came a long way toward understanding the points of view of the other members. Koke and Fringer agreed. Fringer said the three reviewed some things that had happened in the past and how they could prevent similar problems in the future.

Kerns said MDNR, EPA and Air Force agreed that attendance at BCT meetings from now on will be by invitation only, and that contractors and support staff will come to meetings only when the BCT members believe their presence would be useful. They would be on call, he said, so that they could be consulted or give reports.

Kerns also said that this would be his last BCT meeting, and that Frazier will become the MDNR's BCT member. Fringer asked, for clarification, that it meant Frazier would be signing off for MDNR on Decision Documents. Kerns said that was the case.

The facilitator asked for further clarification. He asked if each of the three BCT members is empowered by his superior to make a decision at the BCT. Fringer said BCT members sign Decision Documents. The Facilitator said he was talking about anything that the BCT did, not just Decision Documents; any agreement that is reached at the BCT table about anything.

Kerns said that is true except that before a decision is reached the MDNR member has to have already discussed the issue with superiors. He said MDNR was not going to make any snap decisions. The Facilitator said that was understandable, but that the presumption is that, after talking with superiors, the BCT member could act with appropriate authority. Kerns said he thought that was the intent.

Kerns said another result of the Partnering Meeting was the decision to have a BCT member telephone conference call every Wednesday to stay up to speed on activities in an effort to streamline the process.

Item 3. (Update on review of past BCT minutes)

Kerns has agreed to review past BCT minutes to catalogue decisions back to 1993-94, present them to the BCT, and see if those decisions are still valid, or need to be readdressed. Fringer said he would go through the administrative record and project files and summarize them for the BCT.

Kerns said his report would be in by June 29, 1998, and Fringer said he should complete his summary by the end of May, 1998.

Item 4. (Discussion of Revised FTE assigned to Bob Koke for FY98-FY01)

Koke said he had overdrawn the BRAC account, but EPA has told him to proceed on the basis of 20 hours a week, or one-half of a FTE. Fringer said he had requested 0.8 FTE. Frazier asked Fringer if he had heard anything about the DSMOA waiver that would pay additional money to MDNR for its oversight. Fringer said he had not heard anything but that he would inquire and then report during the next BCT conference call.

Item 5 (Update on Status of OWS965)

Bob Zuiss reported that the sump liquid and solids were removed from the sump April 1, drummed, sent to a special land fill in Kansas, and disposed of properly. He said demolition of the structure and backfilling of the site will be completed by today. Zuiss said the final report on the site should be available by the end of April.

Kerns asked if any of the removed material was determined to have been a hazardous waste. Zuiss replied that none of the material was hazardous waste.

Item 7 (Update on the ECS schedule)

Dale Cira reported that CH2MHILL was on track with the ECS, with its draft report due June 12, 1998. The draft NFRAPs will go to the Air Force this week, and after internal review the EPA and MDNR should begin receiving NFRAPs no later than April 24. Barrett said that based on review by CH2MHILL eight of the 19 sites could qualify for NFRAP. Those are SS003, SS004, SS006, ST007, SS008, CS002, CS001, and AOC009. Barrett noted that the final site was outside the purview of the firm's contract. Barrett said another six sites are considered "Maybe" for NFRAP status, depending upon the BCT accepting some risk-based arguments, but that it is too early to tell at this point.

Cira presented a flow chart (see attachment) that could be used to justify NFA status. He said the key elements of the decision-making are a review of the data, and adequate characterization: "The point is to show you what we are going to do by logic." Cira said the chart was not a deliverable but simple illustrative of the process.

The chart had two distinct trees, one for ground water and one for soil. To explain how the chart worked, Cira said CH2MHILL would look at ground water to see first if it is

potable. If it is not potable, he said, the next step is to determine if it belongs in an underground storage program. If it does, then UST criteria should be applied, and if it does not, the Safe Drinking Water Act would be considered as a basis to start with.

Any recommendation for a NFRAP means that it will have gone through this process, Cira said. He said CH2MHILL is going to apply the most conservative standards that are out there. He said if the first bar is met, then it is a very easy decision. MCLs are very easy to see, UST criteria are easy to see. He said "once you go beyond that level it gets a little more complicated." On the soil side, Cira said the same logic is being applied. He said if the site contains contaminants of concern it will be compared with USTs, which often is more stringent than any-use soil levels (ASLs).

Kerns said the MDNR had no ASLs. Cira said the State Health Department has cited ASLs, but Kerns stated that the Air Force is not dealing with the Health Department: "As far as we are concerned there are no ASLs."

Cira said his firm is applying what it believes is conservative guidance accepted by most programs. He said there are no other programs by which CH2MHILL can begin the evaluation process. These are any-use soil levels. Kerns said MDNR will look at anything the Air Force proposes, but it may not agree.

Kerns and Cira discussed where identification of ARARs should come into play on the logic-flow chart. Cira said the ARARs would be identified well down in the flow chart, but Kerns suggested that MDNR furnish ARARs once the site is adequately characterized, which occurs near the top of the chart, at step Three. Fringer said it seemed that Box Three would be where ARARs would be identified, but if there are none we would go through the blocks to see what would apply.

Cira said everyone was talking the same thing, but that steps Seven through 16 is the process by which ARARs would be identified. Fringer said this approach has been used at other sites in Missouri so he saw nothing wrong with using it for Richards-Gebaur.

In summing up, Kerns said it would be difficult for MDNR to give site-specific ARARs until the site has been fully characterized..

Item 8 (OL Phasedown Update)

Fringer said that AFBCA Site Manager Garey Reeves is investigating possible meeting places for the BCT and Restoration Advisory Board after the base closes and the OL operation is shut down. Frazier asked if the present building will be available, and Fringer said that is not the case. Zuiss said the city will take over a one-year renewable lease on all of the property, and then turn it over to a real estate management to get tenants for the buildings.

Item 9 (Update on Drop Zone-Belton Training Center)

Fringer said the Air Force is reviewing files to determine what decisions were made in the past. He said it is the Air Force Reserve's responsibility to get the necessary clearance until we make sure what needs to be done

Item 10 (Update on AOCs for Buildings 918 and 603, the Steamline Bleeder Release and the Tarmac Area.)

Zuiss reported that after going back into the files he discovered

There never was a Visual Site Inspection (VSI) on the tarmac fuel line risers and meter pits.

Samples were not taken in the stressed vegetation area near Building 603 after a VSI in 1994

No samples were taken in the stressed vegetation area near Building 918 after a VSI in 1994

Zuiss reminded the BCT that the only information the stressed vegetation could have been the result of contaminants were two hearsay reports that someone "may have changed the oil in his car" outside Building 603 and "someone may have thrown something out the back door" of Building 918.

Frazier, Koke and Fringer echoed past BCT discussions, in which they had agreed informally that since no records could pinpoint the exact locations of the stressed vegetation, with nothing but rumor to support the supposed cause, and since the vegetation was no longer stressed, it could be assumed that the stress had been the result of natural causes and the sites could be closed. Frazier pointed out that the two stressed vegetation Areas of Concern ought to be visited by the BCT, which could then decide once and for all if they can be closed. He said that if the exact sites can't be identified it would be pointless to try to take samples.

Frazier said he believed the tarmac area ought to be characterized. Fringer said there is no evidence that there had been any spills or leaks, not down-gradient contamination, in the tarmac area. Kerns said that Whiteman AFB was similar, in that while there was no discernible evidence of leakage or spoilage, sampling found leakage at the risers and filler area

The BCT members agreed to make a VSI on each of the sites this afternoon after the BCT adjourned.

Item 11 (Other Business)

Kay Grosinske of AFCEE/ERB reported that the Dames & Moore contract will take a hiatus, and no work will be done by the engineering firm until the Air Force decides to reactivate the firm. This decision is based on financial reasons, she said

Item 12 (Proposed Agenda Topics for May BCT)

1. Data Needs report/analysis.
2. Discussion of 1996 BCT decision on screening levels two orders of magnitude below action levels.
3. Draft NFRAP discussion. Cira said there should be seven or eight NFRAPs, and he stressed that the BCT will not be asked to approve any of them in May. He said it is just an exchange of views on the drafts. Kerns suggested Cira pick out a couple for discussion and that they would use one of them. He likened it to a technical review meeting. Frazier said MDNR would not sign any NFRAP until the public has had the opportunity to comment, and Fringer and Cira pointed out that there is a 60-day public comment period.

Meeting Adjourned

Minutes compiled and submitted by:


Syd Courson, CCI

Attachments:

- A. UST Closure and Registration Status Table
- B. CH2MHILL Logic Flow Chart for NFRAP Justification
- C. April 8, 1998 letter from Air Force to MDNR re USTs
- D. April 10, 1998 letter from Air Force to EPA/MDNR re AOCs



DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

AFBCA/DB
1700 North Moore Street, Suite 2300
Arlington VA 22204-2808

April 8, 1998

Mr. Guy Frazier and Mr. Fred Hudson
Missouri Department of Natural Resources
Division of Environmental Quality
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Mr. Frazier and Mr. Hudson,

Per the BCT agreement during the April 2, 1998 BCT meeting, AFBCA directed Ms. Monica Rakovan of the Texas Center for Applied Technology to register and/or close out (as appropriate) all 43 USTs located at Richards-Gebaur Air Force Base (AFB). Ms. Rakovan has prepared registration forms for the 43 USTs listed in Draft Table 1 (attached). This table was presented to the BCT members on April 2, 1998.

Ms. Rakovan will personally carry the forms and submit them to you on April 16, 1998. She will work together with you to attempt to fill in any missing information on the forms (and in Table 1).

Thank you for your cooperation. If you have any questions, comments, or concerns about this process, please call me at (703) 696-5573.

Sincerely,

A handwritten signature in cursive script that reads "John H. Fringer".

JOHN H. FRINGER, P.E.
BRAC Environmental Coordinator

Attachments:

As stated

cc:

Mr. Bob Zuss, AFBCA Richards-Gebaur
Mr. Bob Keke, U.S. EPA Region VII

DEPARTMENT OF THE AIR FORCE
AIR FORCE BASE CONVERSION AGENCY

April 10, 1998

MEMORANDUM FOR: MISSOURI DEPARTMENT OF NATURAL RESOURCES
ATTENTION: MR. DON KERNS AND MR. GUY FRAZIERU.S. ENVIRONMENTAL PROTECTION AGENCY, Region VII
ATTENTION: MR. BOB KOKEFROM: AFBCA/DB
1700 N. Moore Street, Suite 2300
Arlington, VA 22209-2802SUBJECT: Three Areas of Concern: 1) Stressed Vegetation—Building 603 [AOC-004];
2) Stressed Vegetation—Building 918 [AOC-005]; 3) Tarmac Fuel Line
Area [AOC-006]

As a result of our discussion and our Visual Site Inspections (VSIs) conducted during the BCT meeting on April 2, 1998, Mr. Bob Zuiss and I will be preparing Category I NFRAP Decision Documents for the first two Subject AOCs. It became apparent from our review of the past information (which was distributed at the BCT meeting) that the areas were erroneously designated as AOCs during previous assessments and can now be designated as areas of no suspected contamination (ANSCs). We will prepare these NFRAPs—as well as the NFRAP for the Steamline Bleeder Release AOC—according to:

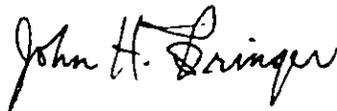
- 1) the format distributed by CH2M Hill in the April 2nd BCT meeting;
- 2) Appendix A (“Example Category I NFRAP Decision Document”) of the U.S.A.F. Environmental Restoration Program NFRAP Guide, Final--June 1995

We plan to submit drafts of these documents for your review and comment before the end of May 1998. As with the NFRAP Decision Documents being prepared by CH2M Hill, please submit written comments within 60 days of your receipt of the documents. To help keep our memories of these areas fresh and thus expedite completion of quality documents, please remember that we welcome comments submitted as soon as possible by fax or e-mail.

As a result of our BCT discussion and VSI of the Tarmac Fuel Line Area, we will coordinate with you in preparing a sampling and analysis plan of this AOC in accordance with the MDNR’s UST Closure Guidance document.

Thank you for your cooperation. If you have any questions, comments, or concerns, please call me at (703) 696-5573.

Sincerely



JOHN H. FRINGER, P.E
BRAC Environmental Coordinator

cc:

Mr. Bob Zuiss, AFBCA Richards-Gebaur