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

June 27, 1998

MEMORANDUM FOR DISTRIBUTION

SUBJECT: Meeting Minutes of the Richards-Gebaur BCT

PLACE: 15471 Hangar Road, Kansas City, Missouri

DATE: Thursday, June 4, 1998

Attending:

Peter Barrett, CH2M HILL

Dale Cira, CH2M HILL

John Fringer, BEC

Guy Frazier, MDNR

Kay Grosinske, AFCEE/ERB

Robert Koke, EPA Region 7

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 May BCT Minutes  
**Minutes approved with no changes.**

Item 2. Discussion of Weekly Conference Calls  
BEC John Fringer discussed with BCT members Guy Frazier of MDNR and Bob Koke of EPA the weekly conference call that was instituted after the April partnering session. Fringer said he believed the calls were important and asked Koke and Frazier if they would care to help set them up, so that everyone would have ownership and would buy in to participating. Koke and Frazier indicated that trying to have a rigid time to have the weekly conference call on a fixed day at a fixed time caused logistical problems, and that more flexibility was needed. **It was decided that during each weekly call the BCT members would schedule the following week's call. The next call was scheduled for 10 a.m. June 9. Fringer, Koke and the facilitator will check to determine various conference call options, including the feasibility of having permanent call-in numbers when BCT members are traveling.**

Item 3. Status of the Report on "Environmental Sampling and Abandonment of OWS 965."

Fringer said comments have been received from AFCEE and ERC, and that Fringer and the OL will add comments for the contractor to add to the report. **He EPA and MDNR should have the report by June 26. When asked, Frazier said he needed 45 days for his review.**

Item 4. Summary of Monica Rakovan's UST Closure/registration Status.

(A portion of this summary and discussion occurred via telephone call with Monica Rakovan.)

Fringer said Monica Rakovan, the contractor handling UST registration/closure for the Air Force, met with MDNR staff, including Frazier, on May 20, 1998, to discuss the issues involved. One issue involved registration of tanks that were not on Air Force property. **The decision was that those tanks were not the responsibility of AFBCA, and that Rakovan would talk with the U.S. Army Corps of Engineers to determine if they should be handled under the FUDS program.**

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Rakovan, via speakerphone, said MDNR now has 35 of the UST registration forms, and that the state will enter the registration information and close the USTs. Those 35 were removed from the base in 1988, prior to the date that the present regulations took effect. **Rakovan said five USTs were removed after that date, and the Air Force will have to take appropriate steps to have them closed. Rakovan also said the Air Force will have to determine if those tanks contained some substances other than fuel. If they contained TCE or DCE, for example, they would be RCRA sites.**

**Fringer said he has asked MDNR for a 30-day turnaround. Frazier said the UST section does not subscribe to deadlines, but that it will do them as quickly as it can get them done.**

Fringer asked Frazier what procedure has been used in the past for closing RCRA USTs. Frazier said that RCRA regulations are used, and that typically RCRA goes to background levels for determining screening levels. Fringer asked what level is used. Frazier said that if there was no background level at a site, then the screening level would start at zero, although typically there are exceptions.

Fringer said he couldn't believe that RCRA would go to zero. For metals, he said, there are three different published background level tables. Frazier repeated that if it is not a naturally occurring substance in the background, it is zero.

**Frazier said MDNR will give RCRA information about the tanks that had waste oil, solvents, acids and other non-fuel contents, tell them what was in them and characterize the sites. The MDNR will wait to see what the RCRA experts have to say about cleanup levels.**

Fringer asked Dale Cira of CH2M HILL if he had any experience on RCRA sites. Cira said no, but that he understood there was some flexibility on background levels. Cira added that Frazier was correct in saying that you need to take a look at what makes sense for background.

Frazier said the Air Force can speed up the process by giving RCRA as much information as possible on site characteristics and other details. He said that if there are blank spots in the information, it can take longer. He also told Fringer that he could not provide a time estimate for responses because he did not know RCRA's present workload.

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Frazier also pointed out that after a tank has been closed under UST regulations, it still might fall under RCRA. Cira said it was his understanding that the issue at this time is purely an administrative one -- if the USTs are registered and already documented, they can be closed under UST guidelines. Rakovan agreed, adding that if there are other issues, then each can be examined under RCRA review. In other words, she said, the tanks will be closed but the site may require work under RCRA. Frazier agreed. **Rakovan asked when the MDNR would begin RCRA review and Frazier said probably as soon as UST closure is completed.**

Item 5. ECS Schedule Update

Cira said that CH2M HILL is 30 days behind the original schedule to submit the Evaluation & Consolidation summary report because over the last several BCT meetings the pace has been slowed by the need for a step by step process in discussing the process, submission of NFRAP drafts and discussion of data needs. He said those pieces must fall in place, but that once they do the delay will not have an overall negative effect on the final schedule.

Fringer said the Air Force is trying to adhere to the schedule for several reasons. He said delay could affect the cost; that delays could cause documents to pile up, causing the reviewer to unnecessarily overwhelmed. Fringer attributed part of the delay to the fact that the Air Force did not budget enough time for its internal review.

Item 6. FOST-EBSS Preparation for 1100/1200 Areas

Bob Zuiss of OL said ownership of both areas will be transferred through public sales, most likely to the city of Belton. The 1100 area is probably scheduled to be for park use, while the use of the 1200 area is not known, although most likely it will be for commercial-industrial use. Zuiss said the BCT would conduct a VSI following today's meeting, and Fringer said transfer of the property is scheduled in January 1999.

Item 7. BCT Workshop Discussion

Koke said he thought it was a very worthwhile workshop. He said there was another workshop session that he would like to have attended but the agenda made it seem that it was only for people who worked for one of the military services. Koke said it should be noted in future agendas whether a workshop session is open to all attendees.

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## Item 8. Monitoring Well Security

At its May 1998 meeting, the BCT discovered during a site inspection that there was no lock or other security device on a monitoring well behind Building 927. Zuiss said then that he would check every similar site. Zuiss reported that all other monitoring wells were secured properly. He said he placed a padlock on the 927 monitoring well. He said it posed no problem in any event since there is no sampling under way. Frazier suggested going to a railroad seal on each, but Zuiss said that seemed unnecessary at this time, but that it would be considered if monitoring resumes. During this discussion, it was disclosed that when the OL closes at R-G, a small office for records storage will be established in the old Military Club building.

## Item 9. Tarmac Area Sampling Strategy

Zuiss said he walked the entire area with the contractor to discuss how the sampling would be conducted for the six hydrants and connecting lines. He said each sample point will be analyzed individually. There will be six samples taken at each hydrant, three samples at the cut-off pipe ends, six samples at the meter pits, plus sampling one foot below the pipe.

Frazier said the contractor will be sampling for BTEX, diesel-range organics, TPH-DRO (OA-2) and MBTH. Frazier said that ST007 had hits of BTEX and things that were not JP-4, so he told the contractor to sample for BTEX just so there would be no question about it. **Zuiss said if the BCT agrees with this approach he will proceed with instructions to the contractor. The BCT agreed and Zuiss said he will update the BCT at its July 9 meeting. By then, he said, the contractor will have a work plan and estimate.**

## Item 10 Summary of E&amp;C Study findings to date.

Barrett presented (see attachment) CH2M HILL's summary of the status of NFRAPs. Barrett reviewed the sites, stating that of the 23 sites, the administrative records and technical data indicate that only eight require additional work. They are:

- AOC-001, Central Drainage Area (metals in sediments)
- AOC-003, Firing Range (metals in soils)
- AOC-006, Tarmac Fuel Line (unsampled at this time)
- AOC-12, Fuel Hydrant Line (insufficient data)
- AOC-12, Industrial Waste Line, (insufficient data)
- ST005, POL Yard (hydrocarbons on soils)
- XO-001, Belton training Complex (metals in soil and surface water)
- CS003, OWS 947B, POL Yard (still in operation)

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CH2M Hill found 15 sites needed no further action. Barrett said NFRAP documents for seven were submitted to the BCT in May:

- CS001, Fuel line-942 Section
- CS002, OWS Bldg. 704
- SS003, Oil saturated Area
- SS004, Hazardous Waste Drum Storage Area
- SS006, Hazardous Materials Storage Area
- ST007, Leaking USTs
- SS008, Test Cell Area

The NFRAP documents on the other eight sites that have been completed and that were submitted to the Air Force today for its internal review were:

- CS004, UST 620A
- SS002, Fire Valve Area
- ★ FT002, North Burn Pit
- AOC002, North Drainage Pond
- AOC004, Stressed Vegetation, Bldg. 603
- AOC005, Stressed Vegetation, Bldg. 918
- AOC009, Steamline Bleeder Release
- AOC010, Bldg. 918 Parking Lot.

Frazier asked Barrett how his company could recommend NFRAPs for ST007, CS002, ST007 and FT002, when those tanks were just now getting through the UST program. Frazier asked Fringer if the action was premature, pointing out that the Air Force was proposing to close the site before it gets through the UST program, even when RCRA may re-open it.

Barrett said it may be an unusual way to go about it, and it may seem a little contradictory, but administratively it made sense. Frazier said he understood, but that he was looking at it from MDNR perspective and he could not agree to a NFRAP on a site that is not closed.

Cira responded, saying that there is no immediate impact, and that if there is a question then MDNR can put check marks by them (sites and/or tanks) and pull them out and process them. He added that it is CH2M HILL's opinion that none of these probably need to be a RCRA program, but that the UST section probably will make that decision. He said CH2M Hill is assuming these sites can be closed based on the data we have. It doesn't change the facts. He said that the Air Force is not asking for MDNR's answer tomorrow, but that they feel by the time MDNR's response is due those pieces will be in place, and if RCRA comes into play it will be dealt with.

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Frazier said the state can't approve a NFRAP until the tank sites are closed. He said as long as further action is required, he can't sign a "no further action" document. Cira told Frazier the Air Force simply wants MDNR to go through the review process, but not necessarily sign any documents until all required actions have been taken. Fringer asked Barrett if CH2M HILL is aware of any other contaminants that would make these sites RCRA sites, and Barrett said he was unaware of any. Frazier added that the Air Force should keep in mind that he makes a clear distinction between waste oil and used fuel, because solvents typically wind up in waste oil.

Barrett continued with his summary, discussing each of the sites for which completed NFRAPs were being presented at the meeting (see attachment) for specifics).

NFRAP Site CS004 – UST620A:

A 550-gallon waste oil UST was removed in 1988; sampling showed TPH at 39 ppm. Sampling and eventual excavation took place over the next seven years, until the sampling showed Non Detects for TPH and BTEX, and the site was restored to original grade in 1995. The following year, two below ground level soil samples showed traces of Arsenic and Barium above ASLs, but they were deemed unrelated to site activities and were within naturally-occurring background concentrations.

NFRAP Site SS009 – Fire Valve Area:

The site was identified in 1992 during fire hydrant line repairs and 10 cubic yards of soil was removed. In 1994, there were 22 borings and 70 soil samples, of which 17 were sent for lab analysis for TPH, VOCs and SVOCs. One sample exceeded action levels for TPH-DRO. The sample level was 370 ppm. Barrett said the MDNR UST Matrix score for sites gives TPH cleanup goal of 500 ppm. In 1996, three sampling wells were drilled. One was dry, the others were analyzed for VOCs. There were some hits above action levels. Two contained PCE and TCE above MCLs. The highest concentration was PCE at 33 ppm. There was no evidence of soil contamination except visual observation when the line was repaired and the one sample that showed 370 ppm of TPH-DRO. Barrett said CH2M HILL does not believe there is any hydrocarbon contamination at the site. He said the source was removed and the site does not pose an unacceptable risk.

Both Koke and Frazier asked if the area had been the site of a dry cleaner or laundry, since PCE is manufactured exclusively for dry cleaning. Fringer checked and said there was no laundry or dry cleaning establishment on the base. Cira pointed out that although PCE is supposed to be just for dry cleaning, it is used extensively as a general cleaner and solvent. Frazier asked if there could be a source to explain its presence, but no source could be identified. Cira said it probably was the result of poor housekeeping by someone who routinely used the cleaning product.

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Frazier said it seemed to be awfully deep in the ground, and wondered if it could be leaching from another source. Barrett replied that there is no evidence to suggest it was used in the area. Fringer said the ground water is isolated and it isn't going anywhere. Barrett said it was a mystery, but it doesn't pose a risk.

NFRAP Site FT002 – North Burn Pit:

The site was used for fire-fighting training from 1965 through 1988, with waste oils/solvents used to start fires until 1969 and JP-4 from 1969-1988. The site was sampled extensively from 1986 through 1996, and all samples were below action levels. Frazier asked if this is the site to which a Little Blue River fish kill was tied in 1980 because of JP-4. No one else recalled this. Frazier said he had seen an aerial photograph the Corps of Engineers has of contaminants running from Richards-Gebaur to the Little Blue River. Barrett repeated that there has been no sampling that shows any contamination above action levels.

NFRAP Site AOC 002 – North Drainage Pond:

The site is a retention pond built in 1975 to collect runoff from runways. The pond is usually dry. It retains water only for a couple of days after storms. Barrett said in 1996 samples were taken, including a ground water sample and a surface water sample. He said TPH DRO showed 771 ppm, with several PAHs at 24 ppm (maximum), and all others below action levels. The detected compounds were consistent with flightline runoff. The chemicals involved have low mobility, the source has been removed, access restricted and no risk is posed.

NFRAP Site AOC 010 – Bldg. 918 Parking Lot:

Barrett said a soil gas survey in 1992 recorded elevated TVH concentration. Since then, borings and sampling have disclosed no detects of TPH and VOCs.. He said there is no contamination at the site, so there is no risk.

NFRAP Sites AOC 009 – Steamline Bleeder Release, AOC 005 – Bldgs. 918 and 603:

Barrett said there is no stressed vegetation now and there never has been any evidence of contamination. The BCT agreed that the sites were not contaminated.

(Out of Order)

Grosinske said that AFCEE has a new CETA contractor (Unitech) to review all documents as part of the Air Force review. The first review was of SS006 (Hazardous Materials Storage Area). She said for the most part the review comments were editorial.

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Item 11. PA/SI XO-001, Belton Training Center Complex

Fringer asked if a 45-day review would be acceptable to MDR and EPA. Frazier said he has a lot of people who have to review it, and the Air Force is starting to drop a lot of NFRAPs on them.

Fringer asked if 60 days would be more realistic. Koke said he could do it in 45 days but that he did it himself, whereas Frazier has to circulate it through a lot of people. **Frazier said he would advise the Air Force at the next conference call if he needed an extension beyond 45 days.**

Item 12. Other Business

Fringer asked Zuiss to report on the possibility of connections between sanitary sewer and Industrial waste lines, which was the subject of an earlier BCT discussion. Zuiss the former base engineer told him he was confident that there are no cross-connections existing. Zuiss said that prior to 1991-92 there were some questionable connections, where maybe a drain line or a sink was connected to surface water runoff. The engineer told Zuiss the problems were corrected and documented. Zuiss added that when and if the industrial waste line is closed, all of that would be confirmed at that time. Zuiss said he believes the Dames & Moore plan to close that and the fuel hydrant line is invalid. Fringer added that the TAV team also had criticized the D&M plan.

Item 13. July BCT Agenda

Fringer said he would prepare the agenda, based on action items from the June meeting, plus suggestions from BCT members. The July BCT meeting will be at 9:30 a.m. July 9, with the RAB meeting at 7 p.m.

Meeting adjourned.

Minutes prepared and submitted by:

  
Syd Courson, CCI