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LETTER AND COMMENTS FROM MISSOURI DEPARTMENT OF NATURAL RESOURCES
REGARDING NO FURTHER RESPONSE ACTION PLANNED FOR SITE SS003 OIL
SATURATED AREA KANSAS CITY MO
7/29/1998
MISSOURI DEPARTMENT OF NATURAL RESOURCES

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

McCombs Governor • Stephen M. Miltood Director

DIVISION OF ENVIRONMENTAL QUALITY

PO Box 176 Jefferson City, MO 65102-0176

July 29, 1998

Mr. John H. Fringer, P E.
AFBCA/DB
1700 North Moore Street, Suite 2300
Arlington, VA 22209-2802

RE: No Further Response Action Planned (NFRAP) for the Former Richards-Gebaur
Air Reserve Station BRAC Site SS003-Oil Saturated Area

Dear Mr. Fringer:

The Department of Natural Resources has reviewed the subject document. The following comments are provided for your action/response.

General Comments

The Missouri Department of Natural Resources previously provided comments on documents pertaining to groundwater assessments at site SS003. Specifically, comments were provided for the Draft Groundwater Assessment (September 1996) in October 1996. To date, the Federal Facilities Section has not received responses to these comments. Many of these comments suggest that further site investigation and characterization are necessary to determine contaminant impacts on groundwater, shallow groundwater flow directions, and site hydrogeology. In order to present all comments on Site SS004 a review of the Final Preliminary Groundwater Assessment (November 1996), which address sites SS003, SS004, SS006, and SS009 was conducted and those comments are being submitted in a separate letter. The Federal Facilities Section believes that these and previous comments address issues that are necessary components in deciding remedial alternatives and/or determining site closure. Therefore, the Federal Facilities Section recommends that the NFRAP decision not proceed until all comments are resolved to the Department's satisfaction.

Specific Comments

1. Section 2.1: There is no discussion of groundwater that is withdrawn from bedrock aquifers for domestic use. The DGLS has documentation of several historic domestic-use wells located within a one-mile radius of RGAFB.

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2 Section 2.2: The DGLS Wellhead Protection Section has recorded documentation of the installation of a private domestic water well within one mile of RGAFB in 1996.

If you have any questions you may call me at (573) 751-2506

Sincerely,

HAZARDOUS WASTE PROGRAM



Guy Frazier, Project Manager, DOD Unit
Federal Facilities Section

GF:lg

c: Bob Koke, EPA
Randy Maley, MDOH