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LETTER REGARDING EPA REVIEW OF THE STRATEGIC PLAN FOR MANAGEMENT OF
THE FORMER RICHARDS-GEBAUR AIR FORCE BASE UNDER THE MISSOURI
BROWNFIELDS VOLUNTARY CLEANUP PROGRAM DATED SEPTEMBER 2007 FORMER
RICHARDS-GEBAUR AIR FORCE BASE KANSAS CITY MO

11/6/2007

U S EPA REGION VII



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

NOV 06 2007

Mr. Chris Morriss
Base Environmental Coordinator
AFRPA/DC-Kelley
143 Billy Mitchell Boulevard, Suite 1
San Antonio, TX 78226-1816

RE: Strategic Plan for Management of the Former Richards-Gebaur Air Force Base Under the Missouri Brownfields/Voluntary Cleanup Program, September 2007

Dear Mr. Morriss:

Thank you for giving the Environmental Protection Agency (EPA) the opportunity to review the above document. As discussed at the meeting at the EPA offices in Kansas City on June 6, 2007, the EPA was committed to consulting with the Missouri Department of Natural Resources (MDNR) to determine whether the July 2004 Superfund Record of Decision (ROD) for the cleanup actions at the Base Realignment and Closure (BRAC) portion of the Former Richards Gebaur Air Force Base (RGAFB) resulted in requirements that needed to be addressed if the site were to enter the Missouri Voluntary Cleanup Program (VCP). A conference call between the VCP and Federal Facilities programs at MDNR and EPA was held on July 29, 2007, to discuss the way forward.

It was determined during the call that the site could enter the VCP but, the appropriateness of future actions at the site would be determined against the existing ROD requirements. In subsequent discussions on October 29, 2007, it was determined that there are two potential options for going forward. One option would be to amend the ROD to change the existing cleanup and monitoring standards based on new valid risk assumptions, or a second option would be to develop new monitoring schemes and frequencies that meet both the ROD requirement and future development plans and activities.

The EPA appreciates the attempt in the above referenced Strategic Plan for developing an alternate monitoring scheme for the site. However, in our review of the document, we do not find that the proposed actions for the sites will comply with the remedy specified in the ROD. The following comments provide some more specific issues with the Strategic Plan:

- 1) Changing the Remedial Action-Cleanup Goals as stated in the ROD cannot be done without additional risk assessment and a ROD amendment;
- 2) Changing to the proposed monitoring areas would not fully encompass the contaminant plumes and thus would not ensure that the plume boundaries and land use control boundaries are well defined;



- 3) Collecting data for the five-year review protectiveness statements and determining when the remedial action cleanup goals have been achieved would not be possible with the proposed monitoring scheme.

These comments and the lack of any justification for changing the existing ROD will require the revisions to the proposed Strategic Plan.

EPA is recommending that other proposals be developed to meet the requirements of the ROD while making efforts to accommodate the redevelopment at the former RGAFB. At the June 6, 2007 meeting, EPA indicated that there could be flexibility regarding both monitoring well placement and monitoring frequency. The EPA believes the site can be developed while meeting the requirements of the ROD and that timely and open communications can facilitate the process. We are willing to make a commitment to such participation.

The Air Force is the lead agency for the implementation of the remedial actions at BRAC sites at the Former RGAFB and should take the lead in developing alternative remedial action plans to take into consideration future development. The EPA is willing to assist the Air Force in developing strategies and facilitating communications between the parties involved with the site to development of a path forward that will comply with the ROD requirements.

If you have question on the issues above please contact me at (913) 551-7717 or Gene Gunn. (913) 551-7776.

Sincerely,



for Diana J. Bailey, RPM
Federal Facilities\Special Emphasis Branch
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CC:

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