STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
Bob Holden, Governor • Stephen M. Mahfood, Director
www.dnr.mo.gov

January 7, 2005

Mr. David Hartshorn
GSA (6PEFS)
1500 East Bannister Rd.
Kansas City, Missouri 64131

RE: *Draft Trichloroethylene Source Investigation Report Building 50 Bannister Federal Complex Kansas City, Missouri* dated October 2004

Dear Mr. Hartshorn:

The Missouri Department of Natural Resources has completed its review of the above referenced document. We were brought in to this project midstream, leaving us in a reactive mode when documents come to us. We would prefer to be a more integral part of the project team and believe we bring significant knowledge, experience and ideas, especially since we have been working at the site for several years.

The department believes there are several items that must be addressed as they relate to the work on Building 50 and the Trichloroethylene (TCE) contamination. It appears to the department that the General Services Administration (GSA) believes that they only need to conduct a limited investigation of TCE contamination, speculate on whether Department of Energy's (DOE) remedies are controlling the contamination and conclude that there are no risks to human health or environment under the current conditions. The data collected so far has been valuable in determining the subsurface conditions in the Area adjacent to Building 50 and 52, but there are data gaps. Finding the source of the TCE and plume behavior over time, still needs investigated. The CERCLA regulations lay out a clear procedure for completing cleanup actions. Although this is not a CERCLA action, the CERCLA procedures provide an excellent guide to the process of investigation and cleanup at this site. The department has developed procedures to expedite the cleanup process for sites such as Building 50. The first document is the Cleanup Levels for Missouri (CALM) guidance document, which guides the reader from site identification to cleanup and no further action. The department is currently working on a new document to replace the CALM guidance document (Missouri Risk Based Corrective Action document).

CERCLA Process-

- Preliminary Assessment
- Site Investigation
- Remedial Investigation
- Feasibility Study
- Proposed Plan
- Record of Decision
- Remedial Design/Work Plan
- Remedial Action Report w/Long-term Stewardship, Monitoring if necessary

CALM Process-

1. Site Identification
2. Site Characterization
3. Risk Assessment and Evaluation
4. Risk Management Plan (Remedies)
5. Report, Monitoring, long term stewardship
6. No Further Action letter except monitoring remedy unless it is a cleanup to unrestricted levels.

The *Draft Trichloroethylene Source Investigation Report* reads as though we have partially completed steps 1, 2, and 3, but now we go straight to step 6. The most recent investigation was limited to one-time soil and groundwater sampling (i.e., the use of direct push technology). Direct push techniques are excellent for providing a snapshot in time of the subsurface conditions that can be used to place monitoring wells for longer-term investigation. However, to get an accurate representation of the subsurface (i.e., groundwater) conditions, multiple events must be completed using monitoring wells. There is no information on changes in contaminant levels over time because monitoring wells have not been installed in locations to monitor the groundwater in the vicinity of Buildings 50 and 52.

The document also presumes that the TCE plume is under control because of two factors: 1) DOE Pump and Treat System, and, 2) Natural Attenuation. These conclusions are based on limited data and assumptions, which may or may not be true. The Environmental Protection Agency (EPA) has guidance documents available which identify the requirements to demonstrate that natural attenuation is a viable remedy option. They include the requirements to demonstrate that a pump and treat system is operating properly and successfully, in addition to the requirements for compliance monitoring.

For your information, here are several references…

Design Guidelines for Conventional Pump-and-Treat Systems, EPA/540/S-97/504 Sept. 1997

Elements for Effective Management of Operating Pump and Treat System OSWER 9355.4-27FS-A Nov. 2002

Technical Protocol for Evaluating Natural Attenuation of Chlorinated Solvents in Groundwater, EPA/600/R-98/128 Sept. 1998

The current document makes no reference to a critical portion of the process, a Risk Management Plan for addressing the media of concern, which in this case is groundwater associated with Building 50 and 52. The Risk Management Plan will identify activities to be implemented to protect human health and the environment under current and reasonably anticipated future activities on and near the site by ensuring that any unacceptable risks identified in the risk assessment are managed. The current document provides no plan for source removal, no information on operational time frames for a pump and treat system, or a plan for institutional controls or compliance monitoring.

General Comments

1. The document is biased towards a conclusion of no further action, where instead, it should focus on what data gaps exist and what further work needs to be done, especially since this is an interim report. The *GSA Building 50 Risk Assessment Plan* states on page 3-1 "If the results are all below the referenced CALM TIER 1 values, a request for a no further action letter will be submitted to the MDNR. If this is not the case, the report will recommend additional action. The additional action will be contingent on which data exceed which CALM values, and may include a TIER 2 or 3 risk evaluation, additional investigation, remedial action, and/or institutional controls."

   Biased language in the document includes the use of the phrases "much lower", "barely above", and "only detected." Conclusions throughout the document are couched in qualitative terms such as "appear to be attenuating", "there may be", "it is believed that", and "may indicate a potential source." This document uses the biased phrases along with the limited data to justify the elimination of the need for further action as outlined in the Work Plan if results exceed the CALM values. Revise the document by providing the results without the biased language and a separate section where interpretation of the data is presented.

2. The document fails to take advantage of the main data resource for the Federal Complex, the DOE. The document does not show whether the main TCE plume is well defined in the area of Building 50. Specifically, the document does not show the DOE monitoring wells in the area, nor does it summarize sampling data from those monitoring wells. Yet, the document concludes that the DOE is successfully capturing all plumes in the area. If the GSA is going to rely on the DOE pump and treat system to control the TCE plume associated with Building 50 and 52, then the GSA must demonstrate the control through compliance monitoring. The GSA will need to propose a monitoring well network to complete the compliance monitoring. The monitoring well network can partially include DOE monitoring wells or entirely include the DOE monitoring wells, if appropriate. The GSA will also have to identify the agreement between the agencies for use of the DOE pump and treat system. Revise the document to identify that the risk management plan will address these issues.

3. Air samples were collected inside Building 50 and 52, presumably to study the indoor vapor pathway. There was no proposal for indoor air monitoring in the *GSA Building 50 Risk Assessment Plan*. The current report does not give a basis for using this method to test the indoor air vapor pathway, nor does it specify a sampling design and compare the detection limits to indoor air quality limits. Yet, the document concludes that samples taken from Building 50 and 52 demonstrate an incomplete vapor pathway. Instead, the document should propose a complete vapor intrusion study using acceptable methods as outlined in the EPA guidance.

   Reference: *Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway from Groundwater and Soils (Subsurface Vapor Intrusion Guidance)* November 2002

Specific Comments

1. Executive Summary, page iv. The document states "The investigation was generally conducted in accordance with the Risk Assessment Work Plan, July 2004." The document needs to identify the areas where the field investigation was not conducted in accordance with the approved Work Plan. Revise this document to identify any field variances to the approved Work Plan.

2. Executive Summary, page iv. The document states "Building 50 was reportedly used at one time as a fuel testing facility constructed with concrete walls and blast-away ceilings." The document does not identify what was done in a fuel testing facility. Revise the document to include any historic information on how a fuel testing facility was used in the manufacturing of engines and the possible contaminants this may have generated.

3. Executive Summary, page vi. The document states "Concentrations of contaminants (including TCE) detected in the manhole southwest of Building 50 in August 2004 are the subject of a separate PCB source investigation, which is in the planning stages." The PCB source investigation reviewed by the department didn't include a TCE investigation for the area around the manhole.

4. Section 1.2.2 Site History, third paragraph, page 1-2. This paragraph purports to describe investigation and remediation at the Kansas City Plant by DOE. The paragraph only describes remediation completed. Please include the ongoing monitoring of contamination by DOE in this section. This deletion is important in reference to the minimal further investigation and the lack of monitoring proposed for the TCE plume northeast of Building 50. Revise the document to include the requested information.

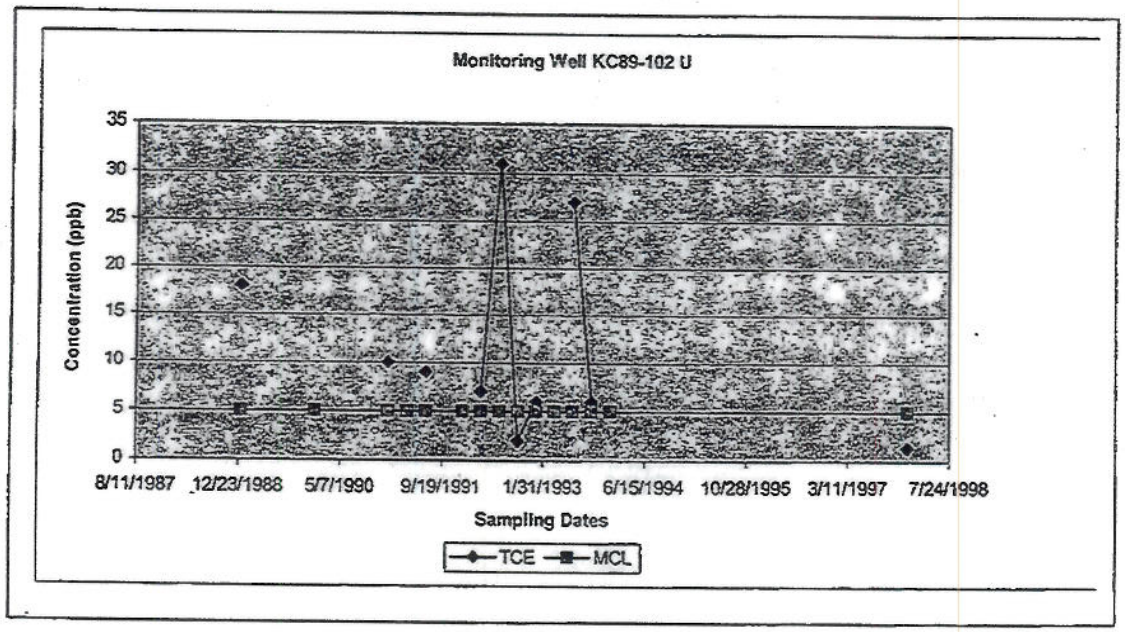
5. Section 1.2.3.1 DOE Storm Sewer Monitoring. This section and several other places in the document refer to outfalls 003 and 004. Yet, there are no Figures in the document that show the location of piping that drains to these outfalls. Revise the document to provide a Figure that shows the location of the storm sewer piping.

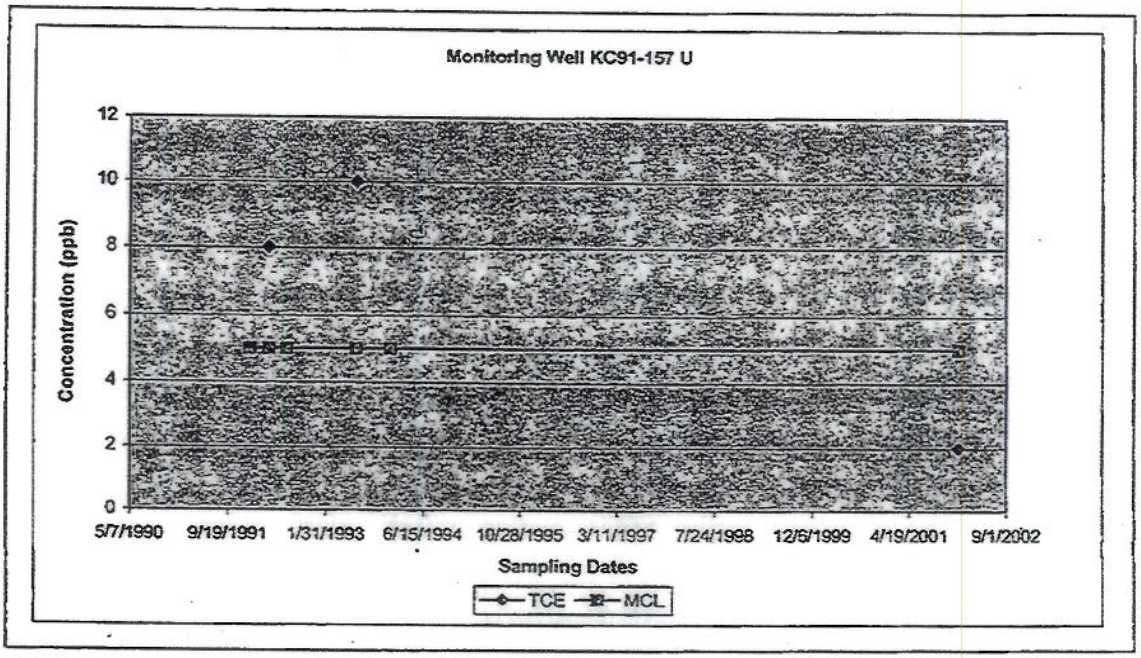
6. Section 1.2.3.3, DOE Groundwater Monitoring, page 1-7. The document states "The most recent report available for review was the Groundwater Corrective Action Report for Calendar Year 2002...." There are reports for 2000, 2001, and 2003, which might include valuable information for the evaluation of the TCE plume associated with Building 50 and 52. The DOE has conducted groundwater monitoring since 1987. Revise the document to include an evaluation of all the groundwater data from the GSA's investigations and the DOE's annual groundwater monitoring.

7. Section 1.2.3.3, DOE Groundwater Monitoring, page 1-8. The plume referenced in this section does not encompass Building 52, suggesting that the TCE found at SP3 is not part of the DOE plume. Please provide a Figure showing the plume and discuss the location of SP3 in relation to the plume. Please also discuss that the DOE wells were used to establish plume boundaries in this area. Few DOE wells in the area could mean that the DOE plume is not well defined and that SP3 is actually in the plume. Conversely, a well-defined plume in the area could mean that SP3 represents a separate area of contamination. Does the DOE have any wells northeast of building 50?

8. Section 1.2.3.3, DOE Groundwater Monitoring, page 1-8. This section states "The downgradient groundwater monitoring wells closest to Building 50 are KC89-102U and KC91-157U (Figure)." There are three downgradient-monitoring wells installed by the GSA contractors, which are closer than KC89-102U and KC91-157U. Revise the above sentence to say that the closest DOE monitoring wells downgradient of Building 50 are KC89-102U and KC91-157U, or identify the three GSA monitoring wells as the closet downgradient monitoring wells.

9. Section 1.2.3.3, DOE Groundwater Monitoring, page 1-8. This section states "both wells have shown a declining trend in volatile organic compounds." This conclusion is based on review of two data points (i.e., 1989 and 1998 for KC89-102U and 1992 and 2002 for KC91-157U). From data in the DOE Groundwater Corrective Action reports you can see that there is some variability in the groundwater data from monitoring wells KC89-102U and KC91-157U. From the figures included it would be difficult to make the conclusion that both wells show a declining trend in volatile organic compounds. Revise the document by removing the above referenced sentence or provide additional justification for the sentence that shows there is a declining trend in volatile organic compounds in monitoring wells KC89-102U and KC91-157U.


Monitoring Well KC89-102 U
Concentration (ppb)
35
30
25
20
15
10
5
0
8/11/1987
12/23/1988
5/7/1990
9/19/1991
1/31/1993
6/15/1994
10/28/1995
3/11/1997
7/24/1998
Sampling Dates
TCE
MCL


Monitoring Well KC91-157 U
Concentration (ppb)
12
10
8
6
4
2
0
5/7/1990
9/19/1991
1/31/1993
6/15/1994
10/28/1995
3/11/1997
7/24/1998
12/5/1999
4/19/2001
9/1/2002
Sampling Dates
TCE
MCL

10. Section 2.1.1 Hydraulic Probe Methods, Locations, and Depths and Section 2.1.3 Groundwater Samples for Chemical Analysis. Both sections state that groundwater samples were taken from each direct push boring with a "vacuum pump". Samples were actually taken with a hand operated bladder pump. Revise the document by correctly identifying the equipment used in the field in both sections.

11. Section 2.2, Monitoring Well Samples, page 2-3. The document states "These three monitoring wells were sampled to provide supplemental, qualitative information about the groundwater near Building 50 and 52." There is no information provided in the document, which qualitatively describes the groundwater based on the results of the sampling of the three monitoring wells. Revise the document to include a qualitative description of the groundwater based on the sampling results of Monitoring Wells 1 – 3. Additionally, include a discussion of how this information was collected during the sampling.

12. Tables 2.1 and 2.2 show that the well screens on the MW wells sampled are fifteen feet long, and there is six feet of sediment in MW1. Please discuss the significance of the long screens and the sediment on the results of sampling.

13. Section 2.4 Air Samples. Please provide an explanation for why this sampling was not included in the Work Plan. Please provide a justification and citation for the use of this methodology for determining vapor intrusion. Please provide a sampling plan that justifies the collection of two samples, as well as the location of the samples.

14. Table 4.1 Soil Sample Analytical Data. Generally, cleanup levels for volatile organic compounds are presented in parts per billion for water and soil. Revise the document to present the results in parts per billion, or explain why the results in the document are presented in parts per million instead of parts per billion.

15. Section 4.5, Current Investigation Results Related to Previous Investigations, page 4-5. This section states "…in general, the results show low or non detectable concentrations just slightly north and northeast of Building 50 (including all probes in the vicinity of Building 52), with a spike of high concentration (19 mg/L) detected in the groundwater from SP3." If you compare the TCE and VC results from the direct push sampling locations to the groundwater target concentrations (GTARC) respectively, you see the concentrations range from 50 times (BH5, vinyl chloride) to 3800 times (SP3, TCE) the GTARC for the entire area. Revise this section limit the discussion to providing the results and provide conclusions later.

16. Section 4.5, Current Investigation Results Related to Previous Investigations, page 4-6. This section states "…particularly in the samples from the most recent investigation (all TCE concentrations less than 1 mg/L). The GTARC for TCE is 0.005 mg/L (5 ug/L) so the results maybe less than 1 mg/L but which of those are below the GTARC for TCE (0.005 mg/L).

Revise the document to identify those monitoring wells, which are below the GTARC for TCE.

17. Section 4.5, Current Investigation Results Related to Previous Investigations, page 4-6. This section states "A comparison of the data from the current investigation and the GSA 2001 investigation shows a declining trend in TCE concentrations and an increasing trend in cis-1, 2-DCE and vinyl chloride." Again, as previously stated in comments, you can't define a trend by two data points; there has been a decrease in TCE concentrations when comparing the two data point. You can not predict with any certainty what is going on in the groundwater with respect to TCE concentrations. Revise the document by stating the TCE concentration has decreased when comparing the two results or provide justification that a trend has been observed in the TCE concentrations.

18. Section 4.5, Current Investigation Results Related to Previous Investigations, page 4-6. This section discusses the lack of TCE in storm sewer samples, despite the statement in Section 5.1.1 that TCE will dissipate in surface water in minutes to hours. Please explain why the "relatively low" levels of TCE in the storm sewers are discussed.

19. Section 4.5, Current Investigation Results Related to Previous Investigations, page 4-6. The section states "Concentrations of TCE detected in water from this storm sewer were relatively low (0.00062 to 0.018 mg/L)." The maximum concentration presented here is 3.6 time the maximum contaminant level (MCL) for groundwater. By using the terms "relatively low," it gives the impression that all results were less then the cleanup levels or groundwater target concentrations (GTARC). Revise the sentence by removing the relatively low and just present the data collected from the storm sewer.

20. Section 5.1.2, Site Specific Fate and Transport, page 5-2. The section states "With respect to groundwater in the immediate vicinity of Building 50, the groundwater data (Figure 4) appear to reflect a decrease in TCE concentrations in the downgradient (southeast) direction and a relative increase in the degradation products, DCE and vinyl chloride. TCE concentrations appear to be attenuating downgradient, probably from a combination of dispersion and biological degradation." Downgradient is to the southwest, but more importantly, the document should not make any conclusions about natural attenuation. Demonstration of natural attenuation requires detailed knowledge over time of the source and its spread. The previously referenced EPA guidance document for evaluating natural attenuation should be followed if natural attenuation is going to be part of the remedy. Since the location and existence of a source is not known, it is impossible to discuss natural attenuation with any certainty. Revise the document to discuss natural attenuation in terms as outlined in the EPA guidance document or completely remove natural attenuation.

21. Section 5.1.2, Site Specific Fate and Transport, page 5-2. This section states "With respect to groundwater in the immediate vicinity of Building 50, the groundwater data (Figure 4) appear to reflect a decrease in TCE concentrations in the downgradient (southeast)

direction..." There is no basis for this conclusion and it is not backed up with data from the DOE. Please provide data for this conclusion or remove it.

22. Section 5.1.2, Site Specific Fate and Transport, page 5-2. This section states "Both plumes appear to be being captured by the West Power House drain tiles." There is no information provided which was evaluated to come to this conclusion. Revise the document to either include the information evaluated to come to this conclusion or remove the statement.

23. Section 5.1.2 Site Specific Fate and Transport, page 5-2. "On the basis of analytical results from the vicinity of Building 50, there may be a secondary source of TCE on the northeast corner of the building. This source seems to be relatively isolated." This conclusion is presumptive from limited results. The source of contamination could easily be from under Building 50. Revise the document to include the information used to make the above conclusion or remove this conclusion from the document.

24. Section 5.4.2, Site Specific Fate and Transport, page 5-5. This section erroneously concludes that, since there is "no obvious or consistent correlation between the locations of the probes in which hexachlorobutadiene was detected," that hexachlorobutadiene contamination is localized in the vicinity of the probes. It is then not discussed at all in the conclusion section. The more reasonable conclusion would be that the lack of correlation of the contaminant to locale or other contaminants requires further study. The conclusion section should then address this. The report should also discuss the historic use of hexachlorobutadiene at the facility.

25. Section 5.4.2, Site Specific Fate and Transport, page 5-5. Hexachlorobutadiene –"appears that it is relatively localized in the vicinity of the respective probes". Please explain the basis for the conclusion that something you have not measured is not present.

26. Section 6.0, Conclusions and Recommendations, page 6-2. The section states "...overall groundwater analytical data indicate a declining trend in concentrations downgradient of this potential source and also a possible declining trend in concentrations over time." This conclusion is based on comparing direct push samples and 15 foot well screen samples over time. This is an inappropriate comparison. Please remove this conclusion from Section 6.0 and the Executive Summary.

27. Figure 2 is not accurate, specifically the path of Freedom Drive and the fencing around Building 52. This lack of accuracy hindered the original fieldwork. Figure 2 should also include the path of piping that drains to outfall 003. Please provide an accurate version of Figure 2.

Minor Comments

1. Section 1.2.1, Site Description. The section states that relation of Buildings 50 and 52 to Troost Ave and 92nd St. are shown on Figure 2. Troost and 92nd are not shown on Figure 2. Please correct text or Figure.

2. Section 1.2.3.2.1, DOE Limited Soils Investigation. This section does not reference any Figures that show the location of the samples discussed. Please add this reference.

3. Attachment I and Appendix A, Section 1.2.3.4 refers to "Attachment I." What apparently represents Attachment I is located under the heading *Appendices,* and it contains no cover page. Section 2.1.1 refers to Appendix A, which is actually the second Appendix. Please correct the terminology and provide cover pages and tabs for each Appendix.

4. Section 3.4.2 Site Hydrogeology. Please provide units for "0.005", and "0.007".

5. Section 4.4 Quality Control Samples. "Although this is a relatively high value, it is not considered to be significant for such low concentration in a soil matrix". Please provide a reference for this statement.

If natural attenuation is one avenue to be pursued by the GSA, then you need to know the following:

The EPA guidance on monitored natural attenuation (MNA) states "In Summary, use of MNA does not imply that EPA or the responsible parties are walking away from the cleanup or financial responsibility of a site."

Additionally, evaluation of natural attenuation as identified in the EPA guidance must include:

- Demonstrating the efficacy of natural attenuation through site characterization.
- Reasonable time frame for remediation.
- Remediation of sources.
- Performance Monitoring and Evaluation.
- Contingency Remedies.

As you will see from the review, we fear that the GSA is not taking the correct approach to investigate and remediate this site. We suggest a planning meeting with GSA and GSA's contractor to discuss the goals, objectives and process that needs to be followed to complete this project.

Regarding future projects between the department and the GSA, we believe that by making us a part of the team at the planning stage, we can help make the cleanup process proceed smoothly from investigation to closure. The department also suggests that the GSA use the TRIAD

approach with the Missouri Risk Based Corrective Action guidance document on future projects. The TRIAD approach is defined as:

> An approach of explicit identification and management of decision uncertainties through systematic project planning, dynamic work strategies, and real-time measurement technologies.

More information on the TRIAD approach can be found at http://www.itrcweb.org/SCM-1.pdf.

If you have any questions or require any further clarification of these comments, please contact me by phone at [redacted] or write to Kansas City Regional Office, 500 NE Colbern Rd., Lee's Summit, Missouri 64086.

Sincerely,

HAZARDOUS WASTE PROGRAM

Scott F. Honig, Environmental Engineer
Federal Facilities Section

SH:dd

Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

January 15, 2010 **(NOTE: This letter replaces letter incorrectly dated January 15, 2009)**

General Services Administration
Attn: David Hartshorn (6PFB)
1500 E. Bannister Road
Kansas City, Mo. 64131

RE: Preliminary Assessment/Site Inspection Report, May 2008, GSA Managed Property Bannister Federal Complex, Kansas City, Missouri, General Services Administration-Kansas City Site, Kansas City, Missouri, CERCLIS ID No. MO0470000530

Dear Mr. Hartshorn:

The Missouri Department of Natural Resources is in receipt of a letter dated May 27, 2008, from SCS Engineers, which transmitted a copy of the subject document to the U. S. Environmental Protection Agency (EPA) Region VII for review and comment. A copy was also sent to this agency, and we are herein providing our initial comments. As previously noted, we request funds through the existing Memorandum of Understanding between the General Services Administration (GSA) and the Department for oversight and review of remediation activities at the Bannister Federal Complex. Please be advised that without these funds the level of detail of the comments may not address all of our agency's concerns or issues. In a similar vein, the timeliness of this review has been constrained by the funding issue. The Missouri Department of Health & Senior Services is also reviewing this document. We will forward their comments when we receive them.

We do note and agree with comments provided to you by the U. S. Environmental Protection Agency Region 7 (EPA), in a letter dated February 5, 2009. We strongly suggest and support any actions that would accelerate continued monitoring and investigation in the day care area. Similarly, in those areas identified as having contamination above or at the MRBCA risk levels, remediation and/or definition of the nature and extent should be put in place. The following are preliminary concerns or comments to the subject PA/SI:

1. There are several recommendations presented by the consultant that this office concurs with and we support having the GSA implement as soon as possible. These include: that any UST closures be noted on the property deed in accordance with MRBCA guidelines and MDNR solid waste regulation; any areas which have received remediation of a PCB spill which included an application of sealant (i.e. epoxy coating) should have a maintenance plan to ensure the seal is effective; and several areas (i.e. Building 1 utility tunnel, Building 4 crawl space, Building 28 battery storage area) of the investigation noted exceedances of MRBCA for lead, arsenic and Aroclor 1260, with a recommendation of cleaning the "small" amount of contamination. We also agree that additional groundwater monitoring near Building 50 is needed.

2. Excluding the former NARA/IRS and former IRS landfill areas from this PA/SI, does not necessarily exclude the need for a PA/SI for those areas separately. Please advise what

the plan or schedule is to have this investigation performed, or whether this has already been performed.

3. The history of Building 4 operations appears to support the need for a more thorough investigation, which should include analysis for solvents as well as petroleum products.

4. The findings of the PA/SI clearly note contamination by TCE as well as its degradation products. A more thorough and extensive investigation and resultant removal/remedial action should be considered as soon as possible. Risk to GSA employees, as well as the noted population of children at the day care, needs to be addressed. Findings on figure 8 indicate excessive contamination of TCE at SP-10 (43,300 ug/l) as well as lesser elevated levels at other investigation locations, and include TCE degradation products at levels above risk based concentrations. Continued periodic air monitoring of the day care area should be maintained to ensure that risk to this population is minimized. The Department requests that the GSA develop a detailed sampling and analysis plan for indoor air sampling at the day care center. We would like to coordinate the finalization of that sampling plan with you.

5. If or when the GSA elects to declare property under their control as "excess to their needs" and out of government ownership, appropriate land use control(s) must be included in all of the transfer documentation. Because of the historical uses at this site (i.e. heavy manufacturing and operations) and relatively small definition of the nature and extent of the multitude of contaminants used through out the site's history; either extensive remediation, Land Use Controls (LUC's) or a combination of the two are needed. Any proposed LUC's must be robust, effective and enforceable in order to maintain protection of human health and the environment.

Should you or your agency have any questions or comments regarding these review comments, please contact me at [redacted] If funding, for a more thorough review or oversight by this office, can be developed, we are available to discuss concerns associated with the site in more detail.

Sincerely,

HAZARDOUS WASTE PROGRAM

Branden B. Doster, Chief
Remediation & Radiological Assessment Unit

BD:dd

c: Mr. Jonathan Garoutte, Department of Health and Senior Services
Mr. Ronald King, U.S. Environmental Protection Agency, Region VII
Mr. Timothy Morales, Branch Chief, General Services Administration

STATE OF MISSOURI
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January 15, 2009

General Services Administration
Attn: David Hartshorn (6PFB)
1500 E. Bannister Road
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1. There are several recommendations presented by the consultant that this office concurs with and we support having the GSA implement as soon as possible. These include: that any UST closures be noted on the property deed in accordance with MRBCA guidelines and MDNR solid waste regulation; any areas which have received remediation of a PCB spill which included an application of sealant (i.e. epoxy coating) should have a maintenance plan to ensure the seal is effective; and several areas (i.e. Building 1 utility tunnel, Building 4 crawl space, Building 28 battery storage area) of the investigation noted exceedances of MRBCA for lead, arsenic and Aroclor 1260, with a recommendation of cleaning the "small" amount of contamination. We also agree that additional groundwater monitoring near Building 50 is needed.

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HAZARDOUS WASTE PROGRAM

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