

ENVIRONMENTAL RESTORATION PROGRAM

**DRAFT FINAL
NO FURTHER ACTION
RECORD OF DECISION**



**157th AIR OPERATIONS GROUP
JEFFERSON BARRACKS AIR NATIONAL GUARD STATION
MISSOURI AIR NATIONAL GUARD
ST. LOUIS, MISSOURI**

Prepared For:

**NGB/A7CVR
Andrews AFB, Maryland**

December 2007

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Prepared For:

**NGB/A7CVR
Andrews AFB, Maryland**

Prepared By:

MWH

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LIST OF ACRONYMS AND ABBREVIATIONS

AOC	area of concern
157 AOG	157 th Air Operations Group
ANG	Air National Guard
ARNG	Army National Guard
AST	aboveground storage tank
A7CVR	Civil and Environmental Restoration Branch
BTEX	benzene, toluene, ethylbenzene, and total xylenes
CALM	Cleanup Levels for Missouri
COCs	chemical constituents of concern
CSR	Code of State Regulations
DP	direct-push
ERP	Environmental Restoration Program
ERP Site 2	AOC-B
GTARC	Groundwater Target Concentration
Jefferson Barracks	Jefferson Barracks Air National Guard Station
MDNR	Missouri Department of Natural Resources
MOANG	Missouri Air National Guard
MWH	MWH Americas, Inc.
NGB	National Guard Bureau
OpTech	Operational Technologies Corporation
PA	Preliminary Assessment
PID	photoionization detector
ROD	Record of Decision
RA	Remedial Action
RI	Remedial Investigation
SI	Site Inspection
STARC	Soil Target Concentration
SVOCs	semivolatile organic compounds
TPH	total petroleum hydrocarbons
U.S.	United States
VA	Veterans Administration
VOCs	volatile organic compounds

GLOSSARY

Specialized terms used in this Proposed Plan are defined below:

Administrative Record: A file containing all the information upon which the lead agency bases its decisions when selecting a final cleanup remedy. It includes analytical studies, reports, plans, decision documents, meeting minutes, maps, and other documentation generated or used during the Environmental Restoration Program (ERP).

Applicable or Relevant and Appropriate Requirements (ARARs): The Federal and State environmental laws that a selected remedy will meet. These requirements may vary among sites and alternatives.

CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act. CERCLA, commonly known as "Superfund," was passed into law in 1980. CERCLA established a program to identify sites where hazardous substances have been or might be released into the environment, ensure that they are cleaned up by the responsible parties or the government, and evaluate damages to natural resources. In 1986 the Superfund Amendments and Reauthorization Act (SARA) amended and reauthorized CERCLA for five years.

Groundwater: Underground water that fills pores in soils or openings in rocks to the point of saturation. Groundwater is often used as a source of drinking water via municipal or domestic wells.

IRP: Installation Restoration Program. The program designed by the Department of Defense to comply with CERCLA requirements for cleanup of contaminated sites at military installations.

No Further Action/No Further Response Action Planned: The designation for a site that has been determined to need no further cleanup action. It can also include sites where contamination has been left in place because it meets certain cleanup standards.

Remedial Investigation: A detailed study of a site or group of sites to determine the type and extent of contamination.

Record of Decision (ROD): A formal document describing the selected remedies for a site or group of sites.

UST: Underground storage tank. Buried tank typically used to store gasoline and other fuels.

1.0 DECLARATION

1.1 SITE NAME AND LOCATION

This Record of Decision (ROD) presents the Selected Remedy for Areas of Concern (AOCs) A, C, and D, and Environmental Restoration Program (ERP) Site 2 at Jefferson Barracks Air National Guard (ANG) Station (Jefferson Barracks) in St. Louis, Missouri.

1.2 STATEMENT OF BASIS AND PURPOSE

The remedy was selected in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986, and to the extent practicable, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). This decision is based on information contained in the Administrative Record for the site. Information not specifically summarized in this ROD or its references, but contained in the Administrative Record, has been considered and is relevant to selection of the remedy at AOCs A, C, and D, and ERP Site 2. Thus the ROD is based upon, and relies upon, the entire Administrative Record file in making the decision.

1.3 DESCRIPTION OF SELECTED REMEDY

The National Guard Bureau (NGB) has determined No Further Action is necessary to protect human health and the environment.

2.0 DECISION SUMMARY

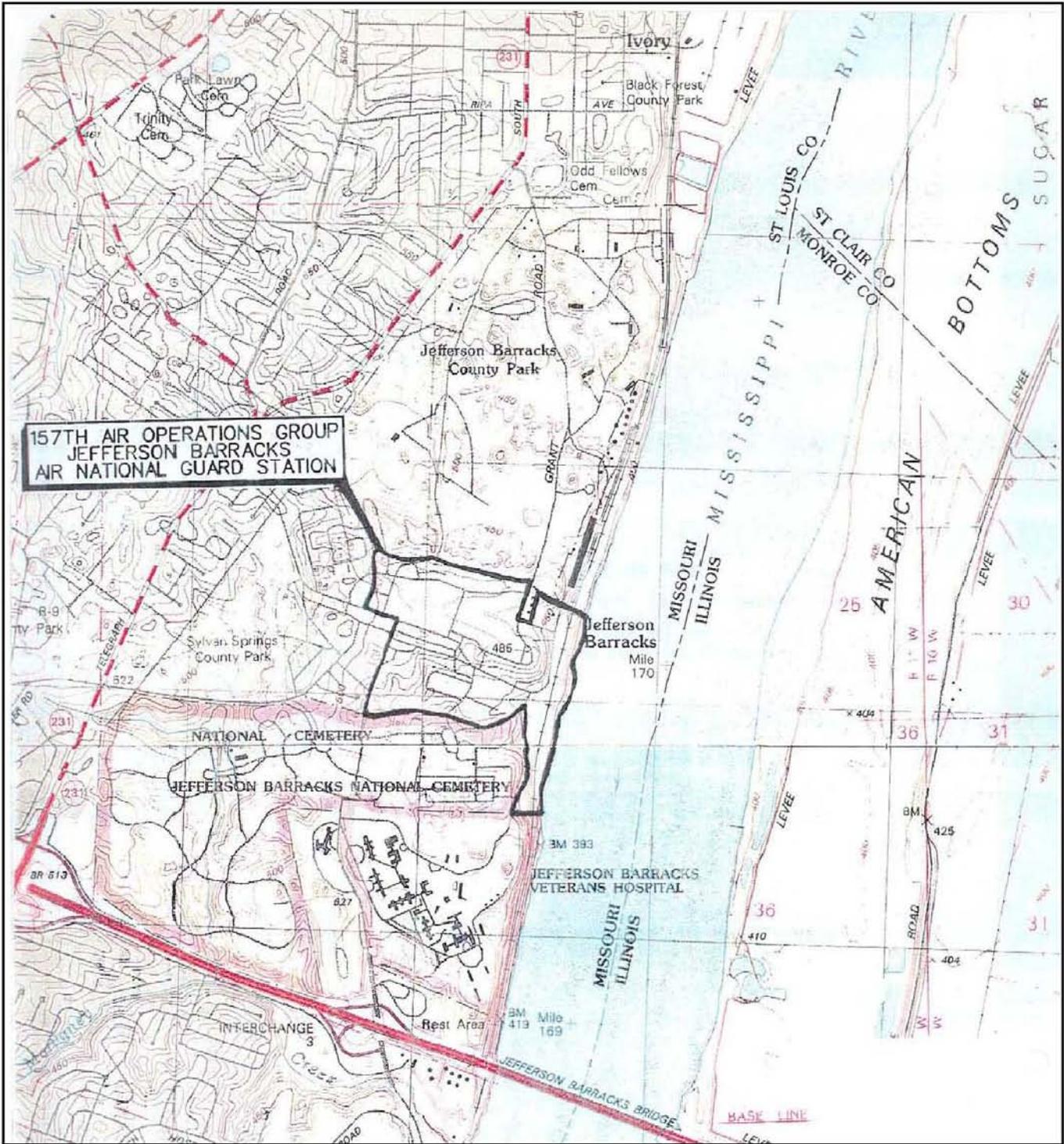
2.1 SITE NAME, LOCATION, AND DESCRIPTION

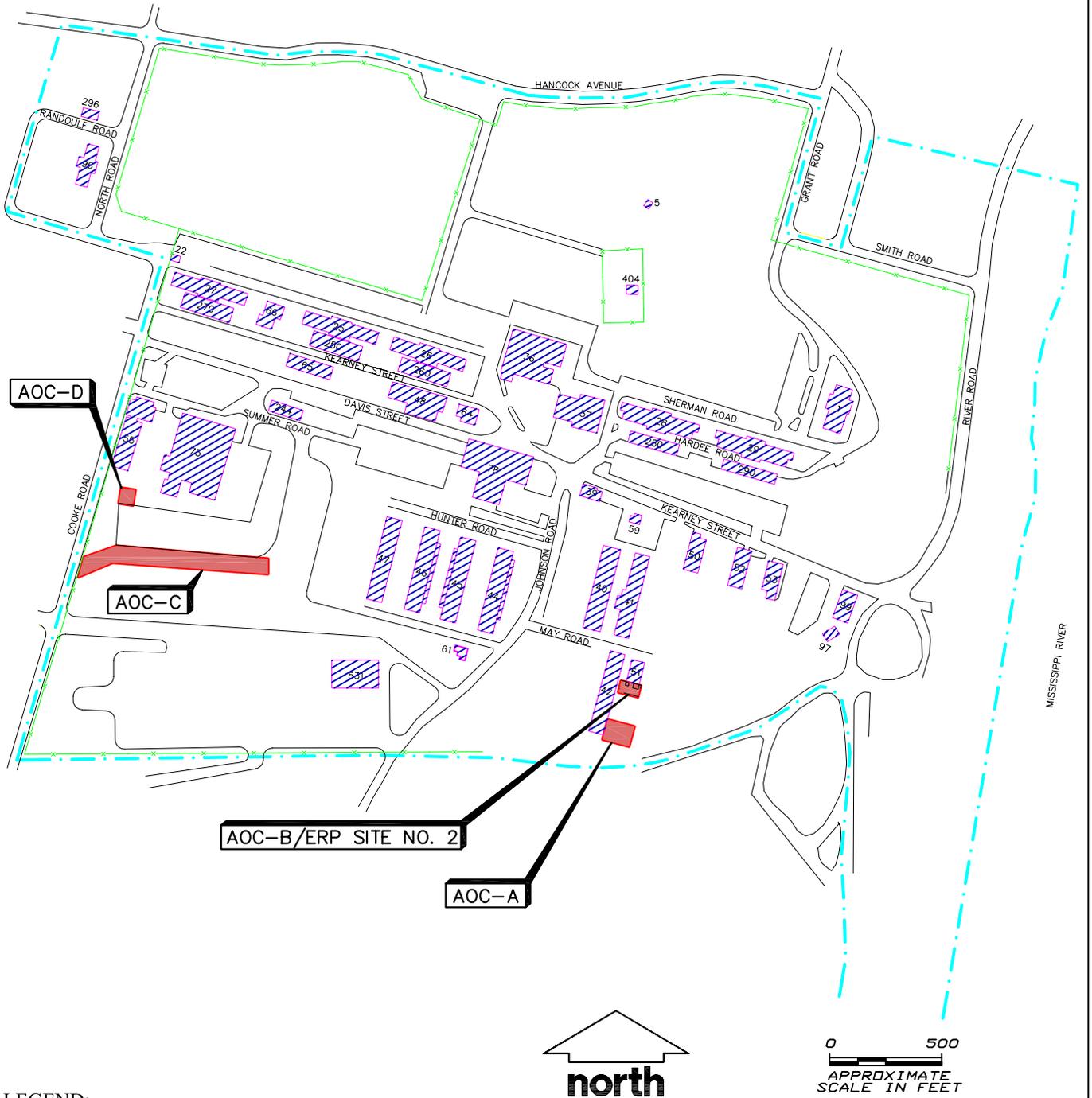
Jefferson Barracks is located in eastern Missouri, near the confluence of the Missouri and Mississippi Rivers. As shown in Figures 1 and 2, Jefferson Barracks lies on the west bank of the Mississippi River, approximately 10 miles south of the City of St. Louis, in St. Louis County, Missouri. Jefferson Barracks occupies approximately 135 acres and is bordered on the east by the Mississippi River. The main entrance is currently through the north gate.

Jefferson Barracks is currently home to several NGB units. ANG units include Headquarters for the 157th Air Operations Group (157 AOG) of the Missouri Air National Guard (MOANG), 218th Engineering Installation Squadron, 121st Air Control Squadron, and a Civil Engineering detachment. Also located at Jefferson Barracks are several Army National Guard (ARNG) units, components of the United States (U.S.) Army Reserve, NGB Human Resources (eastern division), Defense Fuels Supply, and the U.S. Coast Guard. A full-time work force of approximately 140 people support Jefferson Barracks' total unit training assembly population of over 2,000 military personnel (MWH Americas, Inc. [MWH], 2004).

2.2 SITE HISTORY

On July 10, 1826, troops of the U.S. First Infantry Regiment encamped at the site later known as Jefferson Barracks. The military reservation of Jefferson Barracks was established on the edge of a vast expanse of wilderness known as the Louisiana Purchase. At the beginning, Jefferson Barracks was the largest military reservation in the country, covering over 1,700 acres and stretching 2 miles along the west bank of the Mississippi River. Jefferson Barracks was the first basic training camp of the U.S. Army and home of the First U.S. Cavalry. Throughout its history, Jefferson Barracks served as a U.S. Ordnance Depot, U.S. Army Engineers Depot, the largest U.S. Army General Hospital, U.S. Naval Munitions Storage Depot, Introduction and Separation Center, National Guard Mobilization Headquarters, Army Air Corps School, and as a training base. During the 1800s, Jefferson Barracks utilized mainly stone or wooden buildings. An extensive rebuilding program took place between 1890 and 1905, replacing the original stone





LEGEND:

-  BUILDING
-  AREA OF CONCERN
-  FENCE
-  PROPERTY BOUNDARY

SOURCE: IRP PA/SI REPORT FOR JEFFERSON BARRACKS ANG STATION BY OPTECH CORP., MARCH 1997.

157TH AIR OPERATIONS GROUP
JEFFERSON BARRACKS AIR NATIONAL GUARD STATION
ST. LOUIS, MISSOURI

LOCATIONS OF AREAS OF CONCERN

FIGURE 2




and wooden buildings with red brick structures, which are still in use today. During World War I, Jefferson Barracks was designated as a clearing house for recruits. With the advent of World War II, there was a large increase in the population of Jefferson Barracks. Numerous temporary facilities and temporary wooden buildings were constructed to accommodate the increase in population (Operational Technologies Corporation [OpTech], 1997).

On June 30, 1946, Jefferson Barracks was deemed unfavorable for use as a training site for a large modern army, was declared surplus, and erased from the muster roles as an active post. Elements of the Missouri National Guard then moved onto the base. On June 8, 1950, a tract of land containing 135 acres was transferred to the State of Missouri for use in training and maintaining reserve (National Guard) components of the armed forces. Hence, the former 1,700 acres of military reservation was reduced to 135 acres. In 1952, Missouri Guard units at Jefferson Barracks included the ANG's 157th Tactical Control Group, 181st Tactical Control Squadron, two Ground Electronic Engineering Installation Agency Squadrons, and ARNG Organizational Maintenance companies which provided vehicle maintenance to ARNG units in the St. Louis area. By 1970, most ARNG units in the St. Louis area had moved to Jefferson Barracks, and the majority of the maintenance activities at Jefferson Barracks were related to vehicle maintenance support or ARNG combat units (OpTech, 1997).

In order for the Air Force to provide funds for the construction and maintenance of facilities used by the ANG at Jefferson Barracks, Air Force required the property be leased back to the Federal Government for a long term. This lease was signed in 1970 and is effective until the year 2023. Since the lease was signed, the ANG has upgraded many of the 1890- to 1905-era buildings (red brick) to modern-day standards while maintaining their historical architectural features. The temporary wooden buildings from the World War II era have been demolished, with the exception of one building. It has been upgraded and is currently in use as a carpenter shop for the ANG Civil Engineers. Some buildings under ARNG control have been improved, but most have not been maintained due to lack of funds. ANG units assigned to Jefferson Barracks provide radar support to both active and reserve organizations. ARNG units provide combat engineers, military police, and transportation and vehicle maintenance support. The size of the full-time work force, Air Force and Army technicians, active duty personnel, and Missouri State employees gives Jefferson Barracks the appearance of an active duty base (OpTech, 1997).

2.3 COMMUNITY PARTICIPATION

The environmental manager (EM) for Jefferson Barracks, Mr. Arthur Schuermann, has attended and participated in the South County Chamber of Commerce monthly meetings for the past ten years. During each meeting Mr. Schuermann has provided updates to the Chamber of Commerce on issues such as troop deployments, environmental status, and investment. Mr. Schuermann also hosts a biennial luncheon for the Chamber of Commerce at Jefferson Barracks.

This NFA ROD and the supporting Administrative Record Documents will be made available to the public for comment before it is signed as final.

2.4 SCOPE AND ROLE OF REMEDIAL ACTION

Actual or threatened releases of hazardous substances from this site do not present an imminent or substantial endangerment to public health, welfare, or the environment. Unacceptable exposures to hazardous substances from this site will not occur. As a result, the remedial action chosen for remediation at AOCs A, C, and D, and ERP Site 2 is No Further Action

2.5 SITE CHARACTERISTICS

The following is a summary of the characteristics of each AOC/ERP Site.

2.5.1 AOC-A

AOC-A is a waste oil disposal area located at the southeast corner of Building 42 (Figure 2). Prior to World War II, Building 42 was used as quarters for noncommissioned officers and in 1952 the building was converted to administrative offices followed by the addition of an indoor firing range. During the 1960s and 1970s, waste oil generated by vehicle maintenance activities at Building 51 was disposed into a pipe protruding from a concrete pad at the southeast corner of Building 42. Based on the number of vehicles serviced at Building 51 and their oil capacities, it was estimated disposal of waste oil was 4 to 20 gallons per week for a period of seven years. This resulted in an estimated maximum potential of 7,280 gallons of disposed waste oil generated by the facility. At the time of the site visit for the Preliminary Assessment (PA), there was no evidence of either the pipe or the concrete pad (OpTech, 1997).

AOC-A measures approximately 35 feet wide and 60 feet long and is primarily covered with grass, with a gravel roadway running diagonally across it. To the south is a ditch where railroad tracks previously existed. No subsurface structures were identified during the geophysical survey and drilling (OpTech, 1997).

During the Site Investigation (SI), a total of nine soil samples were collected from three soil borings and submitted for laboratory analysis for semivolatile organic compounds (SVOCs), Total petroleum hydrocarbons (TPH), and metals. The soil borings were located where a pipe that was used for disposing motor oil was believed to be located, in the gravel roadway downgradient of the pipe, and in the gravel roadway where low concentrations of TPH are detected during the soil gas survey. One SVOC, bis(2-ethylhexyl)phthalate, was detected at 720 micrograms per kilogram ($\mu\text{g}/\text{kg}$) in one sample, but was determined to be a laboratory contaminant. Metals detected in the samples were all within background concentrations and the volatile organic compounds (VOCs) detected by the field screening did not constitute a threat to human health or the environment (OpTech, 1997).

2.5.2 AOC-B (ERP Site 2)

AOC-B (ERP Site 2) is a storage area located to the south of Building 51, which was reportedly constructed in the late 1960s. Building 51 was used for vehicle maintenance on a full-time basis until 1975. Building 51 had two maintenance bays where two to four vehicles were serviced weekly. The used oil generated by vehicle maintenance activities at Building 51 was disposed east of Building 42 and south of Building 51 during the 1960s and 1970s (OpTech, 1997).

ERP Site 2 was determined during investigation activities to be an approximate 40- by 60-foot area adjacent to the south side of Building 51; which is surfaced by grass, gravel, and a small concrete pad (Figure 3). This area is currently used to store grounds maintenance vehicles and equipment, and other miscellaneous nonhazardous materials. A small storage building/shed is situated on a 10- by 10-foot concrete pad, adjacent to the southwest corner of Building 51; and a 17- by 21-foot concrete tank dike, constructed in 1991, is situated adjacent to the southeast corner of Building 51 (OpTech, 1997).

A 3,000-gallon aboveground storage tank (AST) was used to store waste motor oil in the southwestern portion of the storage area; the AST was removed, and no physical evidence of its previous location remains. The AST replaced 55-gallon drums that had previously been used for storage of used oil. It is estimated the AST was present from the early 1970s until the late 1980s and was used to store waste motor oil from ARNG maintenance facilities. Other materials such as hydraulic fluid, new motor oil, and cleaning compounds were stored in 55-gallon drums on gravel within the storage area. The gravel was periodically replaced because of staining from spilled materials. No records documenting the disposition of the replaced gravel were found during investigative work (MWH, 2004).

As stated in Section 2.3.2.1, the Remedial Investigation (RI) activities included the advancement of eight soil borings, to collect near-surface soil samples; the drilling of boreholes, to facilitate installation of four groundwater monitoring wells; and two separate rounds of groundwater monitoring at the newly-installed wells (Figure 3).

As shown in Figure 3, soil analytical results of the RI activities indicated the contaminants of concern (COCs) were TPH, benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene in soil at concentrations greater than their MDNR Cleanup Levels for Missouri (CALM) Tier 1 Soil Target Concentrations (STARCs) of 200, 0.2, 0.2, and 0.9 mg/kg, respectively (MDNR, 2001). The COCs were generally limited to TPH at a depth of 8 to 10 feet below ground surface at soil boring SB-3, near the southwest corner of the large concrete pad (impacted Area A); and SVOCs in the shallow intervals of soil borings SB-2 and SB-8, east of the former AST (impacted Area B). Metals detected in the soil at ERP Site 2 were determined to be at background levels (MWH, 2004).

The groundwater sampling activities conducted over two rounds in 2003 indicated no COCs greater than MDNR CALM Groundwater Target Concentrations (GTARCs) (MDNR, 2001).

Eight more soil borings were advanced at ERP Site 2 prior to the Remedial Action (RA) to confirm proposed lateral dimensions of the required excavations. A fourth COC, chrysene, was identified as a result of the direct-push (DP) investigation, which was detected at concentrations

greater than the MDNR CALM Tier 1 STARC of 0.2 mg/kg. All soil with COCs exceeding MDNR CALM Tier 1 STARCs were removed from ERP Site 2 during the RA activities in 2005 (MWH, 2006b).

2.5.3 AOC-C

AOC-C is a drainage ditch south of Building 75. The area is located approximately 150 feet south and at a lower elevation from a concrete ramp located southwest of Building 75. The area measures approximately 375 feet long and 10 feet wide. From the 1960s to the 1990s, Building 75 was used for vehicle inspections and maintenance, including oil changes on ARNG vehicles. Vehicles were washed prior to inspection and maintenance. The effluent from the vehicle cleaning, including oils, greases, fuels, and solvents, drained into an 8-inch plastic pipe that emptied into the unlined drainage ditch. This area also received runoff from an unpaved vehicle parking area south of the drainage ditch (OpTech, 1997).

During the SI in 1994, five soil borings were drilled along the centerline of the drainage ditch at equally spaced intervals along the length of the AOC. A total of 10 soil samples were collected and submitted for laboratory analysis for VOCs, SVOCs, TPH, and metals. There were no VOCs, SVOCs, and TPH detected in any of these samples. Metals detected in the soil at ERP Site 2 were determined to be at background levels. The soil screening at AOC-C detected trace concentrations of VOCs, which were not confirmed in the laboratory analysis, and do not constitute a threat to human health or the environment (OpTech, 1997).

2.5.4 AOC-D

Waste oil generated during oil changes at a concrete ramp, located southwest of Building 75 was disposed in an old fuel oil tank. The ramp was used for oil changes in the 1960s and 1970s and was used heavily during and prior to summer deployments. Waste oil disposal was estimated to range from 1 to 10 gallons per week for approximately 10 years. At the time of the site visit for the PA, there existed a filled-in hole in a gravel area (OpTech, 1997).

During the SI in 1994, a total of six soil samples were collected from two soil borings and submitted for laboratory analysis for SVOCs, TPH, and metals. Metals concentrations detected

at AOC-D were all within naturally occurring background levels in soils, except for nickel and zinc, which slightly exceeded background range values. Nickel and zinc are believed to be slightly elevated natural background conditions since historical activities at AOC-C do not include nickel and zinc as potential contaminants. SVOCs and TPH were not detected in any of the samples. Soil screening at AOC-C detected trace concentrations of VOCs, and do not constitute a threat to human health or the environment (OpTech, 1997).

2.5.5 Site Investigations and Interim Remedial Action

2.5.5.1 Preliminary Assessment/Site Inspection. The ANG Readiness Center/Installation Restoration Branch authorized OpTech to conduct a PA/Site Inspection (SI) at Jefferson Barracks. The PA of the 157 AOG was initiated by ANG Readiness Center and OpTech personnel in November 1993. The PA consisted of interviews with personnel who were stationed at Jefferson Barracks at the time of the interview or who were retired or currently assigned to other military installations, all of whom were determined to be knowledgeable of the current and past waste disposal practices conducted at the Jefferson Barracks. The PA also included a review of Jefferson Barracks records and field observations.

The PA process revealed four AOCs at Jefferson Barracks, based on their historical use of hazardous materials and hazardous wastes. One of the four AOCs was designated AOC-B, a storage area south of Building 51, now known as ERP Site No. 2 (Figure 2). The four AOCs (AOC-A through AOC-D) were further investigated by OpTech during the SI phase of their investigation, the purpose of which was to determine if contamination was present at each AOC; and, if so, if the presence of concentrations warranted further investigation as an ERP site. The site characteristics of each AOC are included in Section 2.6.

The SI phase was conducted from December 5 through 15, 1994. The SI activities consisted of: a geophysical survey at AOC-A and AOC-D, to provide information on possible buried sources of COCs, and to verify no subsurface structures or hazards to drilling were present based on historical information obtained during the PA; a soil vapor survey at the four AOCs to delineate the extent of impacting benzene, toluene, ethylbenzene, and total xylenes (BTEX) or total

petroleum hydrocarbons (TPH), the results of which were used to develop the optimum locations of borings; and soil borings at the four AOCs to confirm and attempt to delineate chemical constituents in soil. A total of 14 soil borings were drilled at the AOCs to obtain soil samples for field screening, subsurface geological characterization, and laboratory analytical analyses. A total of 37 soil samples and 3 surface sediment samples were submitted for AOC-specific analytical analyses that included testing for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), TPH, and total metals. The soil samples were field-screened using a photoionization detector (PID) and a field gas chromatograph, and then subsequently analyzed for the laboratory parameters related to the potential COCs identified in the PA.

Piezometer installation was planned as part of the SI activities to determine groundwater flow direction in the vicinity of the AOCs; however, as groundwater was not encountered above the bedrock in the majority of borings during drilling, and at the direction of the ANG Readiness Center, piezometers were not installed (OpTech, 1997).

AOC-A, AOC-C, and AOC-D, designated by OpTech during the PA/SI, received a No Further Response Action Planned designation from the MDNR in a letter dated May 28, 2003 (Strebler, 2003).

2.5.5.2 ERP Site No. 2 Remedial Investigation and Remedial Action.

2.5.5.2.1 Remedial Investigation Activities

The purpose of the RI was to determine the nature and extent of COCs in soil and groundwater at ERP Site No. 2; and to evaluate the threat to public health, welfare, and the environment. The RI activities were conducted by MWH and included: the advancement of eight soil borings, to collect near-surface soil samples; the drilling of boreholes, to facilitate installation of four groundwater monitoring wells; and two separate rounds of groundwater monitoring at the newly-installed wells (Figure 3). The RI fieldwork was conducted during October and December 2003.

As shown in Figure 3, soil analytical results of the RI activities indicated the COCs TPH, benzo(a)anthracene, benzo(a)pyrene, and benzo(b)fluoranthene in soil at

concentrations greater than their MDNR Cleanup Levels of Missouri (CALM) Tier 1 Soil Target Concentrations (STARCs) of 200, 0.2, 0.2, and 0.9 milligrams per kilogram (mg/kg), respectively (MDNR, 2001). The COCs were generally limited to TPH at a depth of 8 to 10 feet below ground surface at soil boring SB-3, near the southwest corner of the large concrete pad (impacted Area A); and SVOCs in the shallow intervals of soil borings SB-2 and SB-8, east of the former aboveground storage tank (AST) (impacted Area B). Metals detected in the soil at ERP Site 2 were determined to be at background levels.

The groundwater sampling activities conducted over two rounds in 2003 indicated no COCs greater than MDNR CALM GTARCs (MDNR, 2001).

Analytical results and analytical summary tables of the sampling activities completed through the 2003 RI activities can be found in the *Final ERP Site No. 2 Remedial Investigation Report*, dated October 2004 (MWH, 2004).

2.5.5.2.2 Remedial Action Activities at ERP Site 2

RA activities at ERP Site 2 were conducted by MWH in October and November 2005. RA activities initially involved a DP investigation on October 20, 2005, in order to confirm proposed lateral dimensions of the required excavations, and the excavation of soil from the impacted areas. The DP investigation included the collection of soil samples at locations SB-9 to SB-16, as shown in Figure 3. A fourth COC, chrysene, was identified as a result of the DP investigation, which was detected at concentrations greater than the MDNR CALM Tier 1 STARC of 0.2 mg/kg. On November 29, 2005, approximately 75 bulk cubic yards of soil were excavated from the three impacted areas at ERP Site 2, as shown in Figure 3. The soil was transported to a licensed Subtitle D landfill, in Roxana, Illinois for disposal.

The impacted soil at ERP Site 2 was removed in three excavations, as shown in Figure 3. Following excavation of the impacted areas, soil samples were collected from the sidewalls and floor of each excavation to confirm the impacted soil, with

COC concentrations in excess of MDNR CALM Tier 1 STARCs (MDNR, 2001), was removed from the site. COC concentrations detected in analyses of the confirmation soil samples were less than MDNR CALM Tier 1 STARCs. MWH submitted results of the RA activities to the MDNR in the Final RA Completion Report, ERP Site 2 in July 2006 (MWH, 2006a). The MDNR approved the Draft RA Completion Report in a letter dated April 17, 2006 (Lang, 2006), which stated the confirmation sampling approach was approved and COC levels detected in the confirmation samples do not indicate any use restriction at ERP Site 2 is necessary. Analytical results and a summary of the activities completed during the RA can be found in the *Final RA Completion Report, ERP Site No. 2*, dated July 2006 (MWH, 2006b). In a letter dated November 16, 2006 (Huckstep, 2006), the MDNR concurred with the findings and results presented in the Final RA Completion Report.

2.5.5.2.3 Abandonment of Monitoring Wells at ERP Site 2

On November 30, 2006, monitoring wells MW-1, MW-3, and MW-4 were plugged in accordance with Missouri well plugging rules (Title 10 Code of State Regulations [CSR] Chapter 23-4.080). MW-2 was inaccessible on November 30, 2006, and was plugged on January 10, 2007, in accordance with Title 10 CSR Chapter 23-4.080. Completed well abandonment records were submitted to the MDNR, NGB, and MOANG.

2.6 CURRENT AND POTENTIAL FUTURE SITE AND RESOURCE USES

Jefferson Barracks' role in today's military is joint reserve forces training. Weapons training at Jefferson Barracks does not involve discharge activities and trainees use a firing range off the facility. The only activities at Jefferson Barracks that have the potential to cause harm to the environment is the routine vehicle maintenance that is undertaken on a significantly smaller scale relative to other military installations. The Jefferson Barracks EM's major duty is to ensure pollution prevention policies are practiced at the facility and any spills or other environmental incidents are properly reported to regulatory authorities.

There are currently no water supply wells at Jefferson Barracks and according to the MDNR, there are no active public water supply wells within a 4-mile radius of Jefferson Barracks (OpTech, 1997).

Presently, there are no plans to change Jefferson Barracks' role and general use of the land and groundwater in the future.

2.7 SITE RISKS

The PA undertaken at Jefferson Barracks in 1993 identified four AOCs to be investigated. In 1994 SI activities were undertaken at the AOCs and it was determined only AOC-B (ERP Site 2) required further investigation. AOC-A, AOC-C, and AOC-D, designated by OpTech during the PA/SI, received a No Further Response Action Planned designation from the MDNR in a letter dated May 28, 2003.

The RI activities undertaken in 2003 and 2004 at ERP Site 2 identified COCs in the soil at concentrations exceeding MDNR Tier 1 STARCs. The RI groundwater sampling activities conducted over two rounds in 2003 indicated no COCs at concentrations greater than MDNR GTARCs. In October and November 2005, RA activities removed all soil with COCs in excess of MDNR Tier 1 STARCs from ERP Site 2.

Based on removal of the soil contamination from ERP Site 2, and the No Further Response Action Planned designation of all other identified AOCs at Jefferson Barracks, no further action with respect to soil and groundwater is necessary at Jefferson Barracks to ensure protection of human health and the environment. With the only known contaminated soil removed, and based on current and future activities at Jefferson Barracks, it is concluded that unacceptable exposures to hazardous substances will not likely occur.

2.8 DOCUMENTATION OF SIGNIFICANT CHANGES FROM PREFERRED ALTERNATIVE OF PROPOSED PLAN

Documentation of any significant changes will be addressed after this document following a 30-day Public Comment Period.

3.0 RESPONSIVENESS SUMMARY

3.1 STAKEHOLDER ISSUES AND LEAD AGENCY RESPONSES

The NGB will hold a 30-day public comment period and offer the opportunity for a public meeting prior to finalizing this proposed decision. Any Stakeholder Issues and Lead Agency Responses will be included in this section.

3.2 TECHNICAL AND LEGAL ISSUES

There are no technical and legal issues that need to be discussed regarding the No Further Action decision at Jefferson Barracks.

4.0 REFERENCES

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