



Department of Energy
National Nuclear Security Administration
Kansas City Site Office
2000 East 95th Street
Kansas City, Missouri 64131-3030

September 1, 2011

Mr. Richard Nussbaum, P.E., R.G.
Chief, Permits Section
Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Mr. Nussbaum:

In accordance with the regulations to modify Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit Number MO9890010524, the Department of Energy (DOE) is requesting a Class 3 modification for the following:

- 1) Expand the "Facility" subject to corrective action under the MHWMF Part I Permit to include the entire contiguous property comprising the Bannister Federal Complex (BFC) that is under federal ownership. This is proposed to provide a complex-wide approach to the completion of environmental corrective action and to allow the establishment of comprehensive complex-wide clean up goals.
- 2) Add the United States General Services Administration (GSA) as a Permittee to the MHWMF Part I Permit, specifically as the Owner and Operator of that portion of the BFC owned by GSA.
- 3) Expand the scope of corrective action activities required by the MHWMF Part I Permit as follows:
 - Prepare a Description of Current Conditions Report (DCCR) and a qualitative Risk Screening document that summarizes current complex-wide environmental conditions. The DCCR will serve to memorialize historical environmental investigations conducted at the BFC by DOE, GSA and the United States Army Corps of Engineers (USACE) with DOE serving as the lead agency under the MHWMF Part I Permit.
 - The DCCR will include a discussion of historical beryllium and depleted uranium presence/use at the facility and a discussion of current and potential future impacts related to the actual and/or potential release of these materials to the environment.
 - The DCCR will review previous complex-wide indoor air investigations, analysis and sampling at the BFC and make recommendations concerning the need for further evaluation of indoor air risks related to contaminated environmental media (e.g.,

soil/groundwater) in light of current and potential future uses of the property.

- The USACE is the federal agency responsible for environmental investigations associated with the Old Landfill currently being addressed under the Formerly Used Defense Sites (FUDS) program. The USACE will remain responsible for defining the extent and rate of migration of any contamination released to the landfill, and will share information, data and documents produced as a result of their investigation and remediation activities. If MDNR determines the need for additional corrective action activities beyond that contemplated by the FUDS program at the landfill, DOE and GSA shall be responsible for the additional work pursuant to the MHWMF Part I Permit.
- The DCCR will provide a complex wide (including the Old Landfill) summary of results of sampling of environmental media used to assess releases of hazardous waste and/or hazardous constituents to the environment.
- The qualitative risk screening will be based on “current day” risk screening criteria and evaluate, across all environmental media and contaminants of concern, potential environmental exposures under a number of possible BFC future re-use scenarios. These scenarios may include re-use of the BFC for industrial or commercial purposes as well as a scenario where all current buildings are removed. This evaluation will also include potential human and ecological exposures in portions of Indian Creek, Boone Creek and the Blue River that border the BFC.
- The DCCR will evaluate opportunities for additional contaminant source reduction in light of the departure of the KCP from the BFC beginning in 2013, especially as it relates to potential reductions in the scope and duration of groundwater pump and treat operations.
- The environmental sampling data and evaluation in the DCCR and the results of the qualitative risk screening will be used to determine if data gaps exist with respect to the extent of releases/impacts and knowledge of potential human and environmental exposures. These data gaps, if any, will then be addressed through additional investigatory activities performed as a part of a RCRA Facility Investigation (RFI). An RFI Work Plan will be prepared and submitted in accordance with the provisions contained in Special Permit Condition VIII of the MHWMF Part I Permit.
- A quantitative complex-wide assessment of human health and ecological risk utilizing the most current version of EPA’s Risk Assessment

Guidance for Superfund (RAGS) will also be conducted as part of the RFI. It will include a quantitative analysis of the potential adverse health and environmental effects caused by releases of hazardous waste or hazardous constituents to the environment at or from the BFC in the absence of any additional actions, other than those currently conducted under Long Term Stewardship, to control releases and minimize/prevent exposures. The results of the risk assessment will be used to help determine whether additional corrective action is necessary at the BFC, to develop new or modify existing clean-up goals, help support the efficacy of existing remedies, previous final remedy decisions and the implementation of any new or modified final remedies.

- Upon completion of activities outlined in the MDNR-approved RFI Work Plan, an RFI Report will be prepared and submitted in accordance the schedule contained in the RFI Work Plan and the provisions contained in Special Permit Condition IX of the MHWMF Part I Permit. The RFI Report will summarize the findings of the investigations conducted to fill the data gaps identified in the DCCR and, if necessary, propose additional work that is needed to address any remaining data gaps. Areas identified in the RFI Report as requiring further corrective action based the quantitative complex-wide risk assessment will be addressed as a part of a Corrective Measures Study (CMS) to be performed in accordance with the provisions contained in Special Permit Conditions X and XI of the MHWMF Part I Permit.
 - Approval of any new or modified final remedies will follow the provisions of Special Permit Condition XII of the MHWMF Part I Permit.
 - A revised Community Relations Plan will be submitted to describe efforts at the BFC to involve the public in the corrective action process. The plan will include a description of various established ongoing community groups formed to foster community involvement in clean-up at the BFC. Planned community outreach activities will also be included.
- 4) Modify the current groundwater pumping system to incorporate the recommendations contained in the document entitled “Evaluation of Optimized Groundwater Extraction Systems at the United States Department of Energy Kansas City Plant” previously submitted to MDNR and EPA in a letter dated August 5, 2010. This evaluation was not previously submitted as a permit modification but was included in the permit renewal application. DOE is now requesting that proposed changes to its pumping system as reflected in the subject evaluation be addressed as part of this proposed permit modification.
 - 5) Add nine groundwater monitoring wells owned by GSA to the list of wells managed by the MHWMF Part I Permit.
 - 6) Revise the point of compliance wells for the Blue River Groundwater Flow System to eliminate pumping wells 277 and 278 and add groundwater monitoring

wells 261, 83 and 68 as point of compliance wells. This proposal is based on the premise that monitoring wells provide a more accurate and reliable indication of groundwater quality than do pumping wells.

- 7) Modify the list of perimeter and effectiveness wells, as defined in the MHWMF Part I Permit, to provide less emphasis on the area of the permeable reactive barrier.
- 8) Modify the content of the Annual Groundwater Corrective Action Report to include information from all groundwater monitoring wells on the BFC, including that obtained from the USACE's wells in the area of the Old Landfill. Complex-wide groundwater flow and quality will be evaluated in the Annual Corrective Action report in comparison with existing groundwater protections standards contained in the MHWMF Part I Permit. The goal of this effort will be to ensure that a complex-wide groundwater remedial strategy is in place and working in accordance with applicable regulatory and MHWMF Part I Permit requirements. In accordance with EPA's previous Burden Reduction Rule, DOE requests that the groundwater/corrective action reporting frequency (excluding the brief semi-annual corrective action progress report) be reduced to annually in accordance with 40 CFR 264.100(g), as incorporated by reference in 10 CSR 25-7.264(1), rather than the current semi-annual reporting frequency required by the MHWMF Part I Permit.
- 9) Conduct a Polychlorinated Biphenyl (PCB) fate and transport study to evaluate all environmental media and the transport mechanisms that may be contributing to the presence of PCBs in surface water, sediment, and biota in receiving streams near the facility. This study will be used to identify additional corrective actions that have the best potential to address human health concerns via reduction of PCB concentrations in biota.

The changes proposed in this modification are shown visually in the following figures and tables enclosed with this request:

- Figure of BFC Property Ownership
- Figure of Current Groundwater Pumping
- Figure of Proposed Groundwater Pumping System
- Figure of Proposed Groundwater Compliance Point Wells
- Table listing all wells comprising BFC groundwater program
- Plate showing all wells (monitoring, pumping, perimeter and effectiveness)

Any Long-Term Operation, Maintenance and Monitoring (LTOM&M) Plan changes resulting from this modification are proposed to be submitted within 60 days of the approved permit modifications.

A 60-day comment period is provided to allow written comments on this request between September 2, 2011 and November 1, 2011.

A public meeting will be held on Monday, September 19, 2011, from 5:00 to 7:00 PM at the Evangel Church, 1414 E. 103rd Street, Kansas City, Missouri 64131 to provide information on the proposed permit modifications and the public comment process.

A draft copy of the letter to be sent to the RCRA Facility Mailing List and a draft Public Notice of these proposed Class 3 modifications are provided for your review.

Please contact David M. Caughey of the DOE Kansas City Site Office at (816) 997-3449 if you have any questions.

Sincerely,

[Original signed by Mark Holecek]

Mark Holecek
Site Manager
Kansas City Site Office

[Original signed by Jason Klumb]

Jason Klumb
Regional Administrator
General Services Administration

[Original signed by Chris Gentile]

Christopher C. Gentile
President
Honeywell Federal Manufacturing and Technologies

cc w/enclosures (8)
Chief; Air, RCRA and Toxics Division, U.S. EPA, Region VII