



Matt Blunt, Governor • Doyle Childers, Director

## DEPARTMENT OF NATURAL RESOURCES

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April 11, 2007

Mr. David Hartshorn  
General Services Administration  
1500 Bannister Road, Room 2135  
Kansas City, MO 64131-3088

RE: Federal Center Facility-607 Hardesty Avenue, Kansas City, Missouri

Dear Mr. Hartshorn:

I have reviewed the Burns and McDonnell report entitled "Off-site Groundwater Investigation Report" for the Hardesty Federal Complex. The report indicates an isolated area of trichloroethene (TCE) contamination exists within the groundwater northeast of the site.

To summarize the report, TCE concentrations were identified above the department's Cleanup Levels for Missouri Groundwater Target Concentrations (GTARCs) action levels within the deep groundwater sample intervals at soil probe (SP-4) and the shallow groundwater sample interval at SP-5. The migration of TCE contamination to the northeast of the site appears to be limited based on surrounding groundwater sample results, which indicated no detections of TCE. The presence of TCE in this area is consistent with the previous off-site groundwater investigation conducted by Terracon in 2003, which indicated TCE migrating northeast of the site. Burns and McDonnell conclude the additional data collected during this investigation was successful in determining the extent of TCE migration to the northeast of the site.

The report indicates an off-site risk evaluation was conducted to assess the potential for adverse health effects to occur as a result of exposure to site-related chemicals. Residential site-specific target levels (SSTLs) were calculated and compared to maximum detected off-site concentrations for each chemical. Off-site data from both the current and 2003 investigation were included in the evaluation. Both the shallow maximum and overall maximum concentrations were well below the calculated SSTLs, indicating that exposure to off-site concentrations of site-related constituents in groundwater does not pose appreciable risk of adverse health effects. The report concludes the risk evaluation indicated the off-site contaminant levels identified within the groundwater are unlikely to present a health hazard to local residents, therefore off-site remediation is not required.

In my review of this report I noted a different crack factor value than the one in the Missouri Risk-Based Corrective Action (MRBCA) guidance document. In further discussions with your risk assessor, this number was taken from the U.S. Environmental Protection Agency (EPA)

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guidance document "Risk Assessment Guidance for Superfund Volume I-Human Health Evaluation Manual, Part E (RAGS)". At the time I reviewed the report I was not sure whether this number could influence the calculated site-specific numbers. Based on further review it does not appear this number would greatly change the calculations. You need to demonstrate the whole plume is stable or shrinking, and if not stable and shrinking additional monitoring or remedial actions may be necessary.

If you have any questions please contact me at 573-751-7538, or Hazardous Waste Program, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Christine O'Keefe  
Environmental Specialist  
Brownfields/Voluntary Cleanup Section

CO:kf