



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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22 OCT 2003

Mr. Brad Scott
Regional Administrator
GSA Region 6
1500 Bannister Road
Kansas City, Missouri 64131

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GSA
ASST. REG. ADM. PBS.
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NOTICE OF COMPLIANCE
VII-03-T-352

Dear Mr. Scott:

This notice provides formal notification of the results of the September 22, 2003, inspection of the Hardesty Federal Complex, located in Kansas City Missouri, conducted pursuant to Section 11 of the Toxic Substances Control Act (TSCA), 15 U.S.C. § 2601 et seq. The purpose of the inspection was to assess the facility's compliance with the requirements of the Polychlorinated Biphenyls (PCB) Final Rule, 40 C.F.R. Part 761.

On the date of the inspection, it appears the facility was not in violation of the PCB Final Rule. Thank you for your courtesy during the inspection.

Please direct any inquiries concerning this inspection or your responsibilities under the PCB Final Rule to my attention at the letterhead address, or you may contact me directly by telephone at (913) 551-7395.

Sincerely,

David A. Phillippi
Chemical Risk Information Branch

PCB INSPECTION REPORT

Hardesty Federal Complex
607 Hardesty Avenue
Kansas City, MO 64124
(816) 823-2227

September 22, 2003
Inspection No. 092203MO01T01
Docket No. 07-03-T-352

INTRODUCTION

This facility was selected for a "For Cause" inspection due to the Missouri Department of Natural Resources' Brownfields Voluntary Cleanup Program's (BVCP's) concerns about possible PCB contamination at the site. The inspection was to determine compliance with the PCB regulations codified at 40 CFR Part 761.

SUMMARY OF OBSERVATIONS

No apparent deviations from the PCB regulations were observed during the inspection.

No samples were collected. Six documents were collected and are included in Attachments 6 through 12 of this report. Eight photographs were taken and are included in Attachment 13.

HISTORY OF BUSINESS

The federal government purchased the site, which included three buildings in the northwest corner of the current site, in 1940. It was used as the Kansas City Quartermaster Depot during World War II. The Quartermaster Depot was used for storage of various types of supplies and for the impregnation of clothing to protect the wearer from gas attacks. Between 1940 and 1943, 15 additional buildings were constructed, and two additional ones were added later. The buildings were identified as Buildings 1 through 20. The site was transferred to GSA on October 1, 1960. Buildings 1 and 2 were sold to Megaspaces, Limited, in 1980 and are no longer part of the complex. Various government agencies have used the buildings for storage since 1960, including the Army Mapping Department, National Weather Service (NWS), FAA, U.S. Marines, Department of Energy, Federal Emergency Management Agency, U.S. Army Corps of Engineers, and the U.S. Postal Service. FAA was the last occupant and they vacated the facility in 1999. Buildings 4, 5, 8, 12, 14, 15, 16, 17, 18, 19, and 20 were removed in the 1970's and 1980's.

Phase I and Phase II audits have been conducted at the facility. Areas of contamination have been determined, and the areas of PCB contamination are currently being cleaned up by SCS Engineers, Kansas City, Missouri.

Mr. Brad Scott is the Regional Administrator for GSA Region 6. His address is GSA, 1500 East Bannister Road, Kansas City, Missouri 64131.

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OCT 15 2003

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PERSONS INTEVIEWED AND INDIVIDUAL RESPONSIBILITIES

Mr. Dave Hartshorn, Industrial Hygienist for GSA, was interviewed. Mr. Hartshorn signed and received copies of all inspection documents, accompanied me during the physical inspection, provided a history of the business, and was present for the closing discussion.

Mr. David Brewer, Vice President of SCS Engineers (SCS), was also interviewed. Mr. Brewer was present during the physical inspection.

Ms. Heather Erickson, Associate Professional for SCS, was also interviewed. Ms. Erickson was present during the physical inspection.

Mr. Jarrett Domling, Staff Professional for SCS, was also interviewed. Mr. Domling was present during the physical inspection.

INSPECTION

On September 22, 2003, at about 1:00 p.m., I, Robert Krager, presented my credentials to Mr. Dave Hartshorn, Industrial Hygienist for GSA. I advised Mr. Hartshorn that Hardesty Federal Complex (Hardesty) had been selected for a "For Cause" inspection due to BVCP's concerns about PCB contamination at the site. I issued the Notice of Inspection and Confidentiality Notice to Mr. Hartshorn, who signed both. Mr. Hartshorn said there would be no claim of confidentiality.

Mr. Hartshorn gave me copies of the inventory of PCB containing equipment, Manifests, and CDs for two PCB transformers disposed in 1987, and a "1999 PCB in Transformer Sampling and Analysis Report" for GSA Region 6 (Attachments 6 through 11). The inventory indicated they had three PCB-contaminated transformers, one by analysis (70 ppm) and two between 50 and 500 ppm PCBs (Attachment 6). I asked Mr. Hartshorn why two of the transformers showed a PCB concentration of 50 and 500 ppm. He said a label on each transformer indicated the transformers contained between 50 and 500 ppm PCBs. The inventory also showed the oil-filled cable had leaked in two places and the PCB concentration was 85 ppb.

The Region 6 report showed, of 68 transformers in the region, only one had over 50 ppm PCBs (Attachment 11). The one PCB-contaminated transformer was from the Hardesty facility.

I copied a map showing the location of the buildings at the complex from BVCP's files (Attachment 12) prior to conducting the inspection.

Mr. Hartshorn said Mr. David Brewer of SCS was supposed to meet us. He said SCS was currently conducting a cleanup of any known PCB contamination at the site. Mr. Brewer and Ms. Erickson, both of SCS, arrived. I presented my credentials and told them I wanted to inspect the electrical system at the facility.

We proceeded to the basement of Building 10, where we met Mr. Jarrett Domling, Staff Professional for SCS. Mr. Domling was overseeing the PCB cleanup. Workers in the basement of Building 10 were removing light ballasts and any contaminated light fixtures for disposal.

We proceeded to the transformer room of Building 10. It contained three substation transformers and one potential transformer (POT). One transformer, No. 1139, had a label indicating it contained between 50 and 500 ppm PCBs (Photo 1). The bare buss bars were on the front of the transformers, so I could not get close enough to the transformer to read the nameplate information. There appeared to be an oil film on part of the transformer and on the frame in front of the transformer. According to analysis reports (to be provided later), the other two substation transformers were non-PCB. The POT appeared to be leaking from the drain valve (Photo 2). Mr. Brewer said there was an oil stain on the floor below the POT and a wipe sample was collected. The results showed a PCB concentration of 86 $\mu\text{g}/100 \text{ cm}^2$. Mr. Brewer said the area was decontaminated and confirmation samples had been collected, but they have not received the results. Mr. Brewer said the reason they had not cleaned the POT or the substation transformer was because all power to the facility (including the property owned by Megaspaces) went through the substation.

Building 11 had a non-PCB transformer in the basement. It had a manufacturing date of 1987. Mr. Brewer showed me an area on the first floor where they had cleaned up a spill coming from either the oil-filled cable or a POT located on the floor above (Photo 3). The ceiling where the cable came through had also been cleaned (Photo 4). Mr. Brewer said the cable had been connected to a POT on the second floor and they could not determine if the cable had leaked or if it was coming from the POT. The POT and the cable had been removed from the second floor substation (Photo 5). The floor below the POT had been cleaned, but it appeared some oil was seeping out from under part of the framework (Photo 6). Mr. Brewer said they would remove that portion of the frame and clean the floor.

Building 9 had a junction box that had leaked oil onto the floor below. A wipe sample of the floor had a PCB concentration of greater than 10 $\mu\text{g}/100 \text{ cm}^2$. Mr. Brewer said the floor and outside of the junction box had been cleaned, but they have not taken the cover off yet. There were no visible oil stains on the junction box. Two dry-type transformers were also in this building.

Building 13 contained transformers owned by Kansas City Power & Light Company (KCPL) (Photo 7). Mr. Brewer said the building was locked and KCPL had the only keys. KCPL had been out to mark the location of the underground cables leaving Building 13.

Building 3 contained a PCB-contaminated transformer and three oil circuit breakers. None of the equipment appeared to be leaking. A junction box in the basement had leaked oil onto the floor. The floor (Photo 8) and the outside of the junction box had been cleaned. There was a small, elevated concrete pad in the basement with oil stains. It looked like an electric motor or similar piece of equipment had been mounted there. I asked Mr. Brewer if they had sampled the area. He said they had not, but they would.

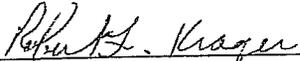
Mr. Brewer said verification samples have been taken from all areas that have been cleaned, but the analysis results were not back yet. I asked Mr. Brewer to send me a copy of all PCB sample results received during the current phase of work. He said he would e-mail the results when he received the confirmation samples.

Mr. Hartshorn and I returned to Building 10 to conduct the closing conference.

CLOSING CONFERENCE

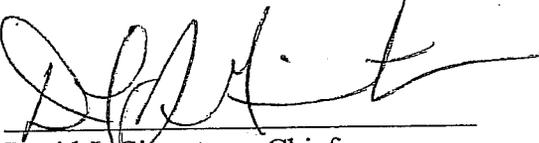
The closing conference was with Mr. Dave Hartshorn, Industrial Hygienist. Mr. Hartshorn signed and received copies of the Receipt for Samples, Declaration of CBI, and Summary of Observations. I told Mr. Hartshorn that it appeared they were removing the PCB contamination according to the regulations and that no apparent deviations from the PCB regulations were observed.

SUBMITTED BY:



Robert L. Krager
Environmental Specialist
Enforcement Section
Hazardous Waste Program
September 25, 2003

APPROVED BY:



David J. Giarratano, Chief
Special Facilities Unit
Enforcement Section
Hazardous Waste Program

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Hardesty Federal Complex
Kansas City, MO
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ATTACHMENTS

1. Notice of Inspection
2. Receipt for Samples
3. Summary of Observations
4. Confidentiality Notice
5. Declaration of CBI
6. Oil-filled Electrical Equipment Inventory
7. Manifest No. G117B
8. CD for Manifest No. G117B
9. Manifest No.H077A
10. CD for Manifest No. H077A
11. PCB in Transformer Sampling and Analysis Report
12. Map of Facility
13. Photographs
14. FTTS