MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

STATEMENT OF BASIS

PROPOSED CONTINGENT REMEDY AND
PROPOSED CONTINGENT PERMIT MODIFICATIONS

BANNISTER FEDERAL COMPLEX
1500-2000 EAST BANNISTER ROAD
KANSAS CITY, MISSOURI
EPA ID# MO9890010524

Facility Type: Former Hazardous Waste Land Disposal and Storage Facility now performing post-closure care and corrective action

Primary Contaminants: Trichloroethylene (TCE) and degradation products, Polychlorinated Biphenyls (PCBs) and Petroleum Hydrocarbons

Media: Soil, groundwater, air, surface water, stream sediment, and fish

Proposed Contingent Remedy: Contaminant source removal, containment and treatment (soil and groundwater); monitoring of groundwater, surface water, sediment and fish; and engineering and institutional controls

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INTRODUCTION

This Statement of Basis describes the proposed contingent permit modifications and proposed contingent revised remedy for contaminated media located on and/or originating from an approximately 225-acre portion of the permitted Bannister Federal Complex (BFC), located at Bannister Road (95th Street) and Troost Avenue in Kansas City, Missouri (see **Exhibit 1**). The National Nuclear Security Administration (NNSA) is contemplating the disposition of that 225-acre portion of BFC to a private developer for demolition, environmental remediation, and economic redevelopment.

The entire permitted BFC consists of approximately 307 acres of land and improvements now owned by the United States of America, under the custody and control of the U.S. General Services Administration (GSA) and the U.S. Department of Energy (DOE). The NNSA, a semi-autonomous agency within the DOE, has been delegated operation and control of the Kansas City Plant (KCP) portion of the BFC.

The BFC is bisected by an active north-south railroad right-of-way owned and operated by the Union Pacific Railroad (UPRR-ROW). East of the UPRR-ROW is approximately 82 acres of land and improvements under the custody and control of the GSA. This eastern portion of the

BFC is not included in the proposed federal property disposition and is hereinafter referred to as the "GSA RETAINED PROPERTY." Activities conducted on the GSA RETAINED PROPERTY shall comply with the applicable provisions of the currently effective Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit, issued by the Missouri Department of Natural Resources (Department), and Hazardous and Solid Waste Amendments (HSWA) Part II Permit, issued by the U.S. Environmental Protection Agency (EPA). Both permits are available on the Department's website at dnr.mo.gov/env/hwp/permits/mo9890010524/information.htm.

To the west of the UPRR-ROW is approximately 225 acres of land and improvements under the divided custody and control of the GSA and DOE/NNSA. This westerly 225 acres of the BFC is the subject of the proposed federal property disposition and is hereinafter referred to as the "PROPERTY TO BE TRANSFERRED." The proposed disposition and future redevelopment of the PROPERTY TO BE TRANSFERRED is the basis upon which the Department initiated the hereinafter described proposed permit modifications.

The proposed permit modifications and implementation of the proposed remedy are contingent on the transfer of that portion of the BFC lying west of the UPRR-ROW to the private developer. The transfer will not become effective until that property is legally transferred to the private developer and the Department and EPA have issued Class 1 Permit Modifications with prior Director approval for the transfer of ownership/operational control of that portion of the BFC.

If the BFC property lying west of the UPRR-ROW is not transferred to a private entity, the proposed permit modifications and proposed remedy actions discussed herein shall become null and void, and the current Permittees shall continue to perform activities in compliance with the current MHWMF Part I Permit and HSWA Part II Permit.

The contingent permit modifications are being proposed as a Department-initiated permit modification, pursuant to Code of State Regulations 10 CSR 25-7.270(1), incorporating Code of Federal Regulations 40 CFR 270.41, based on the criteria contained in 40 CFR 270.41(a)(1) and 40 CFR 270.41(b)(2). There are pending (post-permit transfer) materials and substantial alterations or additions to the permitted facility or activity that will occur after permit issuance which justify the application of permit conditions that are different or absent in the existing permit and the Director has received notification of a proposed transfer of the permit.

In addition to the proposed contingent permit modifications and proposed contingent remedy described in this Statement of Basis, future response actions to be taken at the PROPERTY TO BE TRANSFERRED and off-property areas will be assured by the documentation facilitating the transfer to the private developer. This includes a proposed Administrative Order on Consent (Order) by and among the State of Missouri/Department, the private developer, and NNSA (see **Exhibit 2**).

This Statement of Basis explains the basis for the proposed contingent permit modifications and proposed contingent remedy described in the Corrective Measures Report (CMR) prepared by S.S. Papadopulos & Associates Inc. (April, 2017), as supplemented by a Technical Memorandum: Proposed Cleanup Levels for On-Site Areas of the Bannister Federal Complex (ToxStrategies Technical Memorandum) prepared by ToxStrategies, Inc. (April, 2017). Both documents are available on Honeywell's website at CMR: honeywell.com/sites/aero-kcp/SiteCollectionDocuments/Corrective Measures Report.pdf and ToxStrategies: honeywell.com/sites/aero-kcp/SiteCollectionDocuments/2017_04_21_TS_Cleanup Goals for Redevelopment_draft Final.pdf. The Department prepared this Statement of Basis as part of the requirements of 10 CSR 25-8.124, which reflect the requirements in 40 CFR Part 124.

Upon conveyance of title to the PROPERTY TO BE TRANSFERRED, the concurrent execution and effective date of the Order, and issuance of a modified MHWMF Part I Permit and HSWA Part II Permit to reflect the change in ownership, the obligations for response actions at BFC shall be allocated as follows:

- The private developer shall assume all response actions and reporting obligations for soil, groundwater, and surface water impacted by releases to the environment originating on the PROPERTY TO BE TRANSFERRED.

- The private developer shall also have the responsibility to implement corrective actions beyond the boundary of the PROPERTY TO BE TRANSFERRED in accordance with 10 CSR 25-7.264, incorporating 40 CFR 264.101(c), except for the responsibilities retained by NNSA pursuant to the Order, or GSA pursuant to the MHWMF Part I Permit and HSWA Part II Permit.

- In accordance with the Order, and after conveyance of the PROPERTY TO BE TRANSFERRED, NNSA shall provide the financial assurance and be obligated to execute all corrective measures now or hereafter required under the Order and the MHWMF Part I Permit with respect to PCB contamination of Indian Creek, Boone Creek, and the Blue River originating from the PROPERTY TO BE TRANSFERRED caused by historical releases of polychlorinated biphenyls (PCBs) at the PROPERTY TO BE TRANSFERRED. Such corrective measures shall include, but not be limited to, surface water, sediment, and fish monitoring and warning signage, and any related future corrective measures that may be required by the Department.

- Financial assurance and response obligations for any PCB contamination of Indian Creek, Boone Creek, and the Blue River originating from the GSA RETAINED PROPERTY shall be the responsibility of the U.S. Army Corps of Engineers (USACE) under the federal Formerly Used Defense Sites (FUDS) program and/or GSA pursuant to the MHWMF Part I Permit.

- The private developer shall be responsible for corrective actions associated with the northeast groundwater plume that extends eastward across the property of UPRR-ROW and onto the northerly portions of the GSA RETAINED PROPERTY. All other response obligations related to the GSA RETAINED PROPERTY, inclusive of the former landfill operated by the Navy and certain nearby areas of soil and groundwater contamination, shall be the obligation of the USACE and/or GSA and not the private developer.

This Statement of Basis highlights the information that is presented in greater detail in the BFC Administrative Record. The Administrative Record is a collection of documents and information that supports the proposals contained herein (see **Exhibit 3)**. The Department invites the public to review the Administrative Record for a more complete understanding of the historical environmental issues and corrective actions activities that have been taken at the BFC. The locations where the Administrative Record is available are specified at the end of this Statement of Basis.

The Department invites the public to review and offer written comments on the proposed contingent remedy and proposed contingent permit modifications from May 5, 2017 to June 19, 2017. A public meeting and public hearing about the proposed contingent remedy and proposed contingent permit modifications has been scheduled for May 17, 2017 (see **Exhibit 4**).

Following the public review and comment period and the public hearing described above, the Department will respond to comments from the public in accordance with 10 CSR 25-8.124(1)(A)(17) and make a final permit decision pursuant to 10 CSR 25-8.124(1)(A)(15). Detailed information concerning public participation is provided at the end of this Statement of Basis.

DESCRIPTION OF BANNISTER FEDERAL COMPLEX

The BFC is located approximately 10 miles south of downtown Kansas City, Missouri. The federal land lying east of the UPRR-ROW consists of approximately 82 acres with 561,000 square feet of gross building area. The federal land lying west of the UPRR-ROW consists of approximately 225 acres with 4.4 million square feet of gross building area.[1]

The BFC is bordered on the east by the Blue River and Blue River Road, on the south by Bannister Road and Indian Creek, on the west by Troost Avenue, on the northeast by an intermittent stream known as Boone Creek, and on the north by a wooded bluff and unused city-

[1] An additional two (2) acre parcel of federal land containing a cellular tower located at 9051 Troost Avenue will also be the subject of disposition to the private developer. This so-called "Tower Site" is not part of the permitted land and therefore is not material to this Statement of Basis. There are no known or suspected environmental concerns affecting the Tower Site, and it is not physically contiguous to the principal lands that constitute the BFC.

owned property called Legacy Park. Portions of the BFC lie in the 100-year floodplain; however, a floodwall and levee system protects most of the BFC against a 500-year flood event.

East of the UPRR-ROW, the 82-acre GSA RETAINED PROPERTY is occupied and operated by the Marine Corps Information Technology Center and GSA's South Field Office. It is expected that this land will continue to be used in its current condition.

With respect to that portion of the BFC lying west of the UPRR-ROW being considered for federal disposition to the private developer:

- DOE/NNSA has custody and control of the portion of the BFC (formerly the KCP), consisting of about 119 acres and 2.9 million square feet within 38 buildings.

- GSA has custody and control of the portion of the BFC (formerly the Heartland Regional Office of the GSA), consisting of about 106 acres and 1.5 million square feet within 10 buildings.

- Immediately before the transfer to the private developer, GSA shall transfer its portions of the BFC west of the UPRR-ROW to the DOE/NNSA pursuant to the authority of Section 3143 of the National Defense Authorization Act for Fiscal Year 2014.

Except for surveillance and maintenance activities, neither NNSA nor GSA currently occupy the land or buildings lying west of the UPRR-ROW, having relocated their respective operations to other properties in the Kansas City area.

The BFC is currently zoned M3-5 under the Kansas City Zoning and Development Code, which permits manufacturing, warehouse, wholesale, freight movement, and some limited commercial activities. Adjoining property is zoned for residential and commercial uses. Following conveyance of the PROPERTY TO BE TRANSFERRED, the development and use thereof will be further restricted to certain industrial and limited commercial activities, in accordance with an environmental covenant that will be recorded in the property chain-of-title at the Recorder of Deeds of Jackson County, Missouri, pursuant to the Schedule of Compliance in the proposed contingent permit modifications.

Upon conveyance of the PROPERTY TO BE TRANSFERRED, the private developer intends to immediately commence demolition of virtually all existing structures. As part of the demolition, subsurface utilities will either be excavated or grout-filled and abandoned in place. Following a program of environmental restoration of the PROPERTY TO BE TRANSFERRED as hereinafter described, the private developer intends to commence redevelopment of the property for industrial and limited commercial purposes approximately four years following the federal property disposition.

GSA RETAINED PROPERTY

East of the UPRR-ROW, the GSA owns an office and commercial type structure that was formerly occupied by the Internal Revenue Service and the National Archives and Records Administration, and is now used as a Marine Corps Data Center and administrative offices for the GSA Region 6 South Field Office. On the southerly portion of the GSA RETAINED PROPERTY, there is a former landfill that was established and operated by the U.S. Navy and government contractors from 1942 to 1964, for the disposal of manufacturing waste, including solvents, metals, and petroleum compounds.

On August 12, 2012, the MHWMF Part I Permit and HSWA Part II Permit were modified to encompass the GSA RETAINED PROPERTY. Under the FUDS program, the USACE is currently conducting investigations and remedial work with respect to the former landfill (Solid Waste Management Unit 44), with the Department providing regulatory oversight. Additional information about the USACE's activities is available on the Department's Federal Facilities website at dnr.mo.gov/env/hwp/fedfac/ffs-dod.htm.

In addition, the GSA is conducting investigations and remedial work with respect to other areas of environmental concern on the GSA RETAINED PROPERTY. The presence of solvents has been confirmed in the groundwater in the vicinity of the landfill and to the east of the Marine Corps Data Center building. The presence of petroleum compounds in the soil west of the Marine Corps Data Center building has also been confirmed.

Other than the response actions pertinent to the northeast groundwater contamination plume, the proposed contingent permit modifications and proposed contingent remedy described herein do not pertain to the GSA RETAINED PROPERTY. Accordingly, the GSA shall be responsible for any remedial investigations and implementation, response actions, monitoring, reporting, funding, and financial liability for the GSA RETAINED PROPERTY, in accordance with the current and modified MHWMF Part I and HSWA Part II Permits that are not otherwise addressed by the USACE under the FUDS program, including any future reissuance of the MHWMF Part I Permit.

DOE/NNSA RETAINED RESPONSIBILITIES

Response obligations for the PCB contamination in Indian Creek, Boone Creek, and the Blue River related to historical PCB releases, including but not limited to surface water, sediment, and fish monitoring and maintenance of warning signage, and any related future corrective measures that may be required, shall be the responsibility of NNSA, in accordance with applicable provisions of the Order. Pursuant to 10 CSR 25-7.264, incorporating 40 CFR 264.101(c), and 40 CFR 271.16(e), the Order shall constitute an enforceable document in lieu of a permit with respect to the foregoing retained obligations of DOE/NNSA.

Sampling and reporting requirements pertaining to PCB contamination of off-property stream sediment, surface water, and fish in Indian Creek, Boone Creek, and the Blue River are contained in the MHWMF Part I Permit and will be updated as described in the CMR.

HISTORY OF PROPERTY TO BE TRANSFERRED

Before World War II, the area in and around what became the BFC was mainly farmland, except for the construction and brief operation of the Kansas City Speedway (a 1.25 mile wood oval track) between 1922 and 1924. In 1942, the U.S. Government, through the federally-owned Defense Plant Corporation, took possession of the property and constructed the original main manufacturing building on the PROPERTY TO BE TRANSFERRED. Between 1943 and 1945, Pratt and Whitney Corporation built aircraft engines in the main manufacturing building for the U.S. Navy in support of World War II.

In 1948, the main manufacturing building was transferred to the War Assets Administration, which used the building as a warehouse and for occupancy by several private and governmental entities. Thereafter, the land and buildings were transferred to the Department of the Navy, which leased part of the building to Westinghouse Electric Company in 1948. Westinghouse built jet engines for the Government until 1961.

In 1949, Westinghouse subleased a portion of the main manufacturing building to Bendix Corporation, which was under contract with the Atomic Energy Commission to manufacture electrical, mechanical, plastic, and other non-nuclear components of nuclear weapons and systems. During the period from 1984 to 1999, Bendix merged with Allied Corporation, which merged with the Signal Companies and changed its name to AlliedSignal. In 1999, AlliedSignal merged with the Honeywell Corporation, and adopted the Honeywell name. The current management and operating contractor to NNSA is Honeywell Federal Manufacturing & Technologies LLC. Over the years, the manufacturing areas of the federal property belonging to DOE/NNSA west of the UPRR-ROW came to be known as the KCP, also referred to as the "Bendix Plant" and then the "Honeywell Plant."

The Atomic Energy Commission continued operating at the facility through its management and operating contractor, until it was abolished in 1974. In 1975, the Energy Research and Development Administration was created and took custody and control of the KCP. In 1977, the DOE was created and assumed responsibility for the KCP. In 2000, Congress created the NNSA, in part to strengthen national security and reduce the global threat from weapons of mass destruction. NNSA was established as a semi-autonomous agency within the DOE.

Before operations were relocated to the new National Security Campus in South Kansas City in 2014, the KCP manufactured electrical, mechanical, plastic, and other non-nuclear components of nuclear weapons and systems. The facility stored on-site acids, alkalines, solvents, acid and

alkaline contaminated solid waste, solid debris waste, waste oil, wastewater treatment sludges, and toxic metals. These wastes were stored under hazardous waste treatment storage and disposal facility and generator storage requirements until their disposal at off-site Resource Conservation and Recovery Act (RCRA) permitted facilities or were treated at the on-site Industrial Wastewater Pretreatment Facility. Prior to the cessation of manufacturing at the former KCP, there were six areas of generator container storage of hazardous waste, and three contingent areas.

Some industrial radioactive sources were used on-site, including the handling and machining of radioactive materials at the facility. The former KCP operations incorporated small amounts of radioactive materials in products, and used conventional, sealed sources for instrument calibration, radiography, and laboratory equipment. These processes intermittently generated mixed waste that was managed in one area for container storage of mixed waste prior to shipment off-site for disposal.

GSA exercises custody and control of the western part of the former main manufacturing building and adjacent buildings, together with parking areas and grounds not under the custody of DOE/NNSA or its predecessors. Until 2015, the GSA property west of the UPRR-ROW was used for administrative office space and warehousing, and numerous other federal agencies occupied portions of the GSA space. Early in 2015, GSA moved its regional administrative offices to downtown Kansas City, Missouri. By the end of 2015, all the other federal agencies that occupied the GSA property had departed.

REGULATORY HISTORY OF PROPERTY TO BE TRANSFERRED

In 1983, environmental investigations and cleanup of portions of the BFC began with some corrective actions initiated by 1989. On June 23, 1989, the DOE and EPA entered into a Corrective Action Administrative Order on Consent (3008(h) Order), U.S. EPA Docket Number VII-89-H-0026, for the KCP portion of the BFC, pursuant to the authority of Section 3008(h) of RCRA. The 3008(h) Order initially listed 35 solid waste management units (SWMUs) as possible release sites, including two closed lagoons and an underground tank farm. Since the signing of the 3008(h) Order, ten (10) additional SWMUs and two (2) Areas of Concern (AOCs) have been identified on the currently permitted property.

Many of the SWMUs on the DOE/NNSA-KCP portion of the BFC complex were grouped together for further investigation and cleanup, due to their close proximity to each other and the type of contamination. Post-closure care, corrective action, and long-term stewardship activities for the BFC are being overseen by the Department under Missouri's EPA-authorized hazardous waste (RCRA-equivalent) program. The MHWMF Part I Permit contains the governing requirements for these activities. All interim status regulated hazardous waste management units on the DOE portion of the BFC have been closed, and certifications of closure have been

received and accepted by the Department. There are currently forty-five (45) SWMUs and two (2) AOCs at the BFC. Of these, fifteen (15) SWMUs were previously determined to require no corrective action, and three (3) are undergoing post-closure care. The remaining SWMUs and AOCs are under ongoing corrective action.

The 1989 3008(h) Order initially directed the investigation and corrective action activities at the facility. On Oct. 6, 1999, the Department and the EPA issued two hazardous waste permits to DOE, as the owner, and Honeywell FM&T, as the operator: (i) the Department issued a MHWMF Part I Permit and (ii) EPA issued a HSWA Part II Permit. These permits transferred the oversight responsibility and authority for the investigation and corrective action activities from EPA to the Department. EPA terminated the 3008(h) Order on December 30, 1999. The corrective action process continued thereafter under the Department's MHWMF Part I Permit.

On Sept. 29, 2006, the Department issued MHWMF Part I Permit modifications, requiring the Permittee to implement the approved final remedy for the 95th Terrace site. At that time, this was the last area of the KCP portion of the facility that needed an approved final remedy. Prior final remedy decisions for other all other areas were made by EPA, pursuant to the 3008(h) Order.

Prior to 2012, GSA was performing environmental investigation and remedial activities on its portion of the BFC under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), with EPA providing regulatory oversight. On Aug. 24, 2012, the Department and EPA issued Class 3 Permit modifications to the MHWMF Part I Permit and HSWA Part II Permit, which combined the formerly separate DOE/NNSA and GSA portions of the BFC, naming GSA as a new Permittee and requiring the Permittees to conduct further environmental investigation, monitoring, risk-assessment and cleanup at the BFC under the modified permits. DOE/NNSA and GSA had previously been performing environmental investigation and remediation activities on their respective portions of the BFC, but under separate environmental laws.

The KCP portion of the BFC has three (3) former regulated land disposal units that are under post-closure care. These include two former lagoons and an underground tank farm. The former lagoons were closed by removing contaminated sediment, backfilling with uncontaminated soil, and covering with a clay cap, topsoil, and vegetation. The tank farm consisted of twenty-eight (28) tanks and associated underground piping that stored fuels, coolants, and solvents. Releases from the underground tank farm contributed to soil contamination and groundwater contaminant plumes containing solvents and petroleum products. Closure of the tank farm included removal of all tanks, associated piping, concrete support, and fill to a depth of about fifteen (15) feet below ground surface (bgs). The excavated area was backfilled with uncontaminated soil and then covered with a clay cap, topsoil, and vegetation. The Department accepted DOE's closure report and certification for these hazardous waste management units. Groundwater

contamination resulting from the operation of these units is subject to remediation under the MHWMF Part I Permit. Groundwater use restrictions are also in place to guard against unacceptable risks from exposure to contaminated groundwater.

In addition to providing post-closure care for hazardous waste management units that were unable to "clean close," all permitted hazardous waste treatment, storage and disposal facilities are required to investigate and clean up hazardous waste and hazardous constituent releases resulting from present and past waste and chemical handling practices. These requirements are contained in 40 CFR 264.101, which is incorporated by reference in 10 CSR 25-7.264(1).

The collection of environmental data in the assessment of the BFC and adjacent areas has been ongoing for the last 30 years. The primary contaminants of concern identified over this period are dominated by PCBs and chlorinated solvents, particularly trichloroethylene (TCE) and its degradation products, cis-1,2-DCE and vinyl chloride. Other contaminants include 1,1,1-trichloroethane (1,1,1-TCA), 1,4-dioxane, petroleum hydrocarbons, chlorobenzenes, acetone, and other volatile organic compounds (VOCs). The distribution of these contaminants observed in soil and groundwater suggests that Dense Non-Aqueous Phase Liquids (DNAPLs) have migrated vertically to the bedrock/alluvium interface in some areas, at about 40 feet bgs. Semi-volatile organic compounds, including a variety of polyaromatic hydrocarbons, are also present in soils. In localized portions of the property, PCBs are the dominant contaminant. These are primarily a concern in proximity to historic surface releases near the southeast corner of the main manufacturing building, in proximity to the abandoned Indian Creek Outfall and its replacement (Outfall 002), and in sediments/fish in the adjacent portions of Indian Creek and the Blue River. Metals in soil (arsenic, lead, hexavalent chromium, total chromium, manganese) exceed background concentrations in very limited locations, but as a broader matter are at background concentrations over the majority of the permitted property. Management of potentially contaminated soil in known SWMU areas that needs to be disturbed due to construction or subsurface utility work is currently managed in accordance with a Department-approved Soils Management Plan. As stated above, three (3) SWMUs (the former Tank Farm, and the former north and south lagoons) have been closed and are under post-closure care.

Groundwater contaminants of concern identified at the BFC are primarily organic compounds. These include the same solvents and PCBs found in soils. In some instances, chemicals were released into the subsurface as components of non-aqueous organic liquids (solvents, fuels, thermal transfer fluids) that are only slightly soluble in water. Concentrations indicative of the presence of Non-Aqueous Phase Liquid (NAPL), and therefore the presence of continuing source material, have been observed in the area of the former plating building degreaser just east of the main manufacturing building, in the well KC85-37 area (northeast plume), and in the Building 50 area. The primary solvent released in these areas was TCE. Today, TCE's degradation products, cis-1,2-DCE and vinyl chloride, are also present at high concentrations in the groundwater. Similarly, 1,1,1-TCA was apparently released into soil and groundwater and its

hydrolysis byproduct, 1,1-DCE, is widely observed in association with the 1,1,1-TCA. 1,4-Dioxane, a solvent as well as a stabilizer commonly mixed with 1,1,1-TCA, is also present in groundwater. Other VOCs and petroleum hydrocarbons are intermixed with these primary contaminants. Groundwater contamination areas are generally described and managed in terms of distinct plumes in the upper and lower alluvium. In general, the maximum concentrations of solvents are associated with wells screened in the lower alluvium, where isolated areas of DNAPLs have historically been identified.

In the Department 26 area of the KCP, PCBs are intermixed with the chlorinated solvents due to the release of Therminol heat transfer liquids and with total petroleum hydrocarbons (TPH) (DOE, 1990).

There are two known historical releases of PCBs, both from Department 26, which produced plastic in the southeast corner of the main manufacturing building. PCBs were used in transformers, other electrical equipment, hydraulic oil, caulking compounds, and elastic sealant. In 1969, an expansion joint failed and released approximately 1,500 gallons of PCB oil to a gravel area. About 900 gallons of the PCB oil entered the storm sewer system and was released to Indian Creek through the old Outfall 002. Despite clean-up efforts at the time of the spill, residual PCBs remained in the creek bottom sediments. Shortly after the spill, Indian Creek was rerouted and the PCB contamination was left in place in deep soil alongside and underneath the box culvert that conducts storm water under Bannister Road to Indian Creek.

In 1971, about 1,100 gallons of oil containing PCBs was released to the ground outside Department 26, near a storm water drain. Some of this oil entered the storm sewer system and was released to Indian Creek through the newly installed box culvert near the new Outfall 002. This area of contamination, known as the 95th Terrace site, is located south of the main manufacturing building, in the former Indian Creek channel. The 95th Terrace site is bordered to the south by Indian Creek and is partially located on property owned by the Missouri Department of Transportation. In 2005, the Outfall 002 re-route system was completed, resulting in a significant reduction in PCB loading from the outfall and continued decline in PCB concentrations in sediments in Indian Creek. The New Outfall 002 has been designated as SWMU 15. It is on property owned by the City of Kansas City, Missouri, and discharges storm water from a portion of the BFC under Bannister Road, to the south of the BFC and off of the federally-owned land.

The production of PCBs was banned by EPA in 1979, but a PCB replacement was not required in existing equipment. PCBs were common in cooling systems, transformers, capacitors, electrical equipment, oils, caulking compounds, and elastic sealant. DOE replaced the PCB heat transfer piping and oil in 1986; however, materials made before the PCB ban, such as sealant and transformers, are still present at the KCP and other locations in the area.

The 2012 modifications to the MHWMF Part I Permit required preparation and submittal of a PCB Fate & Transport Study. A final copy of the Indian Creek/Blue River Fate & Transport Study Report was submitted by NNSA to the Department on February 10, 2016.[2] Based on the measured levels of current PCB loading from the BFC facility and the background PCB concentrations in the receiving streams, the Fate and Transport Study recommended implementation of best management practices during remediation and recommends periodic future bioaccumulation studies. The Department approved the Fate and Transport Study on March 14, 2016. The future actions proposed as part of the remedy and reconfiguration of the outfalls for redevelopment purposes are expected to further diminish, if not eliminate, PCB loading to the adjacent streams from that portion of the BFC PROPERTY TO BE TRANSFERRED.

As part of the previously-approved final remedy for the 95th Terrace site, the Permittees were required to inspect and maintain the box culvert under Bannister Road, install and maintain warning signs in the vicinity of Outfall 002, and install a protective cage (access restriction) over the concrete chute entering Indian Creek. The Permittees were also required to sample surface water, sediment, and fish tissue in Indian Creek and the Blue River for PCBs. Fish tissue was sampled/analyzed for PCBs in 2005, 2007, and 2013. Further PCB sampling/analysis for these media is scheduled for 2017 and every five years thereafter, as proposed in the contingent permit modifications. As part of the proposed contingent remedy and proposed contingent permit modifications, the current regulated outfalls on the PROPERTY TO BE TRANSFERRED will be abandoned, thereby eliminating their surface water discharges of PCBs to Indian Creek and Boone Creek from these systems.

Portions of the BFC are already restricted to industrial use only and the groundwater cannot be used for purposes other than monitoring and remediation. Contaminated groundwater is currently collected from extraction wells, building sumps, and building footing tile drains; is treated on-site to acceptable levels; and then discharged to the local publicly-owned treatment works.

At the time of this proposed contingent remedy and proposed contingent permit modifications, previously-approved final remedies are in place for all contaminated areas associated with the original KCP, but not including the GSA property lying west of the UPRR-ROW that will be transferred to the private developer.

Prior to 2012, environmental investigations on the GSA property west of the UPRR-ROW were conducted under CERCLA, with EPA providing regulatory oversight. Additional information about the GSA's prior investigation and remedial efforts is contained in the EPA Region 7 files

[2] While no portions of Indian Creek, Boone Creek or the Blue River are within the PROPERTY TO BE TRANSFERRED, the PCB contamination of those bodies of water and their stream banks and sediments are subject to corrective action pursuant to 10 CSR 25-7.264(1) incorporating 40 CFR 264.101(c)).

for docket number CERCLA-07-2010-0006 and on EPA's website at epa.gov/mo/missouri-cleanups.

STATUS OF SOLID WASTE MANAGEMENT UNITS AND AREAS OF CONCERN

The MHWMF Part I Permit manages areas at the permitted facility where releases of hazardous waste or hazardous constituents to the environment have or could have occurred, called Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs). **Table 1** sets forth the current status of the forty-five (45) SWMUs and two (2) AOCs at the BFC:

TABLE 1

SWMU Number	SWMU Name	Current Regulatory Status[1]
1	Underground Tank Farm	Post-Closure Care - Final Controls In Place; Approval of RCRA closure and post-closure care received in a December 16, 1988 letter from the Department.
2	TCE Still Location	Under Corrective Action
3	Waste Transfer Spill Area	Under Corrective Action
4	Classified Waste Trenches	Under Corrective Action
5	North Lagoon	Post-Closure Care - Final Controls In Place; Approval of RCRA closure and post-closure care received in a December 16, 1988 letter from the Department.
6	Old Ponds	Under Corrective Action
7	North Lagoon Trench Area	Under Corrective Action
8	Outfall 001 Raceway	Under Corrective Action
9	Plating Building Area / Acid & Alkaline Tanks	Under Corrective Action
10	Waste Oil Tank under North End of Plating Building	Under Corrective Action
11	Substation 18 North of former Plating Building	Under Corrective Action
12	Department 26 Outside	Under Corrective Action
13	South Lagoon	Post-Closure Care - Final Controls In Place; Approval of RCRA closure and post-closure care received in a December 16, 1988 letter from the Department.
14	Abandoned Indian Creek Outfall	Under Corrective Action[2]
15	New Outfall 002	No Further Action

SWMU Number	SWMU Name	Current Regulatory Status[1]
16	Sales Building	Under Corrective Action
17	Building 54	Under Corrective Action
18	North Lot	No Further Action
19	Building 16	No Further Action
20	Abandoned Fuel Lines	Under Corrective Action
21	Fuel Oil Tank Unloading Area	Under Corrective Action
22	East of Oil Storage Tanks, Underground Tank Farm, and Building 15, Extending to Lagoons	No Further Action
23	PCBs and Hydraulic Oil Spills in Open Area East of Department 183 Barrel Lot	No Further Action
24	Wastewater Dumping West Building 16	No Further Action
25	Spill of Cutting Oil and Coolants near lot 187-L Outside Diked Area	No Further Action
26	Spill of Caustic Wastewater North of Manufacturing Support Building	No Further Action
27	Dumping of PCB Contaminated Wastewater West of Lagoons	No Further Action
28	Spill of Plating Acid from Truck	No Further Action
29	Southeast Parking Lot	No Further Action
30	Department 27 Outside	Under Corrective Action[3]
31	Department 26 Inside	Under Corrective Action
32	Department 27 Inside	Under Corrective Action
33	Oil House	Under Corrective Action
34	Sanitary Sewer Pump Station	Under Corrective Action[3]
35	East Boilerhouse (Substation 23)	Under Corrective Action
36	Maintenance Vehicle Repair Shop	Under Corrective Action
37	Abandoned Sump	Under Corrective Action
38	Reported Buried Drum Site	Under Corrective Action[3]

SWMU Number	SWMU Name	Current Regulatory Status[1]
39	Department 95	Under Corrective Action
40	Former Chip Handling Building	Under Corrective Action
41	Department 20 Degreaser Pit	Under Corrective Action
42	95th Terrace	Under Corrective Action
43	Test Cell Tanks	Under Corrective Action
44	Former Landfill (GSA RETAINED PROPERTY)	Under Corrective Action
45	Building 50	Under Corrective Action

AOC Number	AOC Name	Current Regulatory Status
1	Chlorinated Solvent Groundwater Contamination East of Marine Corps Building (GSA RETAINED PROPERTY)	Under Investigation
2	Petroleum Hydrocarbon Contamination West of Marine Corps Building (GSA RETAINED PROPERTY)	Further Investigation Planned

[1] Regulatory status based on information in the MHWMF Part I Permit, MO9890010524 - Modified August 24, 2012
[2] The MHWMF Part I Permit states "remediation not required at this time to protect human health and environment" in this SWMU.
[3] The Description of Current Conditions Report (DOE, 2017) lists this SWMU as "No Further Action." The MHWMF Part I Permit does not indicate No Further Action but states "remediation not required at this time to protect human health and environment" in this SWMU.

SUMMARY OF FACILITY RISKS [3]

This section presents a summary of the facility risks, as determined by the investigations and remediation activities to date at the facility, and as quantified in the Baseline Risk Assessment (BRA) (URS, 2015), which is available on Honeywell's website at honeywell.com/sites/aero-kcp/News-Events/Pages/PERMIT.aspx. Preparation of the facility-wide BRA was a required element of the 2012 modifications to the MHWMF Part I Permit that combined the NNSA/DOE

[3] For purposes of this and the subsequent sections of this Statement of Basis, the "facility" does not include the GSA RETAINED PROPERTY, other than with respect to the northeast groundwater contamination plume that extends across northerly portions of the GSA RETAINED PROPERTY.

and GSA portions of the BFC. The primary objective of the BRA was to holistically reassess potential human and environmental risks across the combined properties and to identify any data gaps that needed to be filled to provide for a complete assessment.

The BRA for the BFC was approved by the Department, in coordination with EPA, in July 2016. The BRA addressed both on-property soils and groundwater, as well as off-property environmental concerns in Indian Creek and the Blue River. Using soil, groundwater, and surface water data collected through 2014, the BRA identified chemicals of potential concern and chemicals of potential environmental concern (COPEC). In addition, the BRA calculated baseline human health and environmental risk values for designated exposure areas in soil, groundwater, and off-property streams. Off-property risks were evaluated previously in the BRA, 95th Terrace Site (URS, 2001), and Addendum 1 to the BRA. The Human Health Risk Assessment calculated hazard indices for non-cancer effects and excess cancer risk levels following Department and EPA guidelines. The analytical results for contaminated environmental media were compared to the acceptable cancer risk range of $1x10^{-4}$ to $1x10^{-6}$ and non-carcinogenic hazard index of 1.

Human Health Risk Evaluation

The BRA considered potential on-property receptors that might come into contact with contamination. These were:

- Construction/excavations workers. Construction workers were evaluated for potential ingestion, dermal exposure, and inhalation of dust and vapor from exposure to combined surface and subsurface soil (0-15 feet bgs). In areas of shallow groundwater (groundwater present in the 0-15 ft bgs interval), groundwater exposure was also evaluated via incidental ingestion, direct dermal contact, and inhalation of volatiles.

- Indoor workers in either current or hypothetical future buildings. Workers were evaluated for potential inhalation exposure to VOCs from vapors entering buildings from subsurface contamination (vapor intrusion), and for potential ingestion, dermal exposure, and inhalation of dust and vapor from surface soil.

- Outdoor workers. Outdoor workers were evaluated for potential ingestion, inhalation, and dermal contact with surface soil.

- Utility maintenance workers who would be on-property for a limited period of time to perform maintenance activities on buried utilities.

In addition, potential human off-property receptors were evaluated in the BRA. These were:

- Off-property excavation/construction workers involved in work on the Outfall 002 culvert or along Indian Creek. These workers could potentially be exposed to both contaminated sediments in the creek and along the bank and contaminated surface water.

- Utility maintenance workers, who would work for a limited period of time, performing maintenance activities on buried utilities adjacent to the Blue River or Indian Creek.

- Recreational receptors (adults) that might visit Indian Creek on a regular basis, most likely to be recreational fishermen. These adults were assumed to be exposed to sediment and surface water associated with Outfall 002 and Indian Creek, as well as exposed to contaminants in fish caught in Indian Creek or downstream in the Blue River that were later consumed.

- Recreational receptors (children - ages 6-15 years) that visit Indian Creek on a regular basis. These children were assumed to include waders and recreational fishermen who would be exposed to sediment and surface water associated with Outfall 002 and Indian Creek, as well as ingesting contaminated fish caught in Indian Creek or downstream in the Blue River.

Results of the BRA indicated that on-property soils and groundwater could potentially pose cancer risks exceeding $1x10^{-4}$, or hazard indices exceeding 1, across portions of the property in the event that exposure restrictions enforced under the current permit are removed. The primary media posing potential risks on the property are groundwater and subsurface soils. Pathways of concern included ingestion, direct contact, and inhalation of these media.

Off-property results indicated that potential cancer risks associated with ingestion of fish ranged from $5x10^{-5}$ to $3x10^{-4}$, and that hazard indices ranged from 3 to 5. The lower end of the range of risks and hazards were associated with fish from Indian Creek. The higher end of the range was associated with Boone Creek. The potential fish ingestion risks were based on the assumption that these stream segments are fished on a regular basis for an extended number of years and that 100% of all fish ingested by an angler population originated from the stream or river segments immediately adjacent to the BFC. Actual exposures are likely to be less than those represented by the conservative assumptions used in the BRA. As previously evaluated in the 95th Terrace BRA, an assumption of 25% of all fish ingested was considered more realistic, based on factors such as relative accessibility of the stream segment and inability of the stream segments immediately adjacent to the facility to support a fish population large enough for sustained removal of fish by anglers. Use of this 25% value would result in calculated cancer risks of less than $1x10^{-4}$ and hazard indices of 1 or less.

Surface water results were considered acceptable. Cancer risks were $1x10^{-6}$ or lower and hazard indices were less than 1. Sediment cancer risks exceeded $1x10^{-6}$, and hazard indices exceeded 1, for several receptors in the Blue River, but not for Indian or Boone creeks. The elevated risks and hazards for the Blue River are due to elevated levels of naturally occurring arsenic not related to facility operations. The arsenic exposure point concentration for sediment appeared to be skewed high, due to a small sample set and a single elevated result (116 mg/kg).

Residential land use is present approximately 550 feet south of the southern boundary of the facility property and approximately 280 feet northwest of the northernmost part of the BFC. Sensitive receptor locations, such as schools/daycare centers and recreation sites, are present approximately 2,100 feet northwest (Winfield Academy) and approximately 1,150 feet southeast (3 & 2 Baseball Club of Kansas City) of the facility property boundaries. On-property groundwater use is currently prohibited by deed restriction, except for monitoring and remediation activities. Excluding the PCB-contamination in Indian Creek, Boone Creek, and the Blue River that are addressed as "off-property" risks, impacted soils are contained on the facility property. On the PROPERTY TO BE TRANSFERRED, residential land use will be prohibited. Future land use on the GSA RETAINED PROPERTY is anticipated to be no different than the current industrial/commercial operations. Consequently, exposure routes and pathways will remain the same for current and future receptors.

<u>ToxStrategies Technical Memorandum: Proposed Cleanup Levels for On-Site Areas of the Bannister Federal Complex</u>

The ToxStrategies Technical Memorandum was developed as a supplement to the BRA, to evaluate substantial additional data collected as part of the private developer's due diligence investigation efforts. The ToxStrategies Technical Memorandum proposes Site-Specific Cleanup Levels (SSCLs) for those portions of the BFC being considered for acquisition by the private developer and delineates areas that can be used without restriction for commercial/ industrial purposes and areas where remediation or risk management for specific land-use scenarios is recommended. This provides a refined spatial assessment of environmental conditions to supplement the information presented in the BRA, which previously divided the property into larger areas for evaluating soil and groundwater conditions.

Cleanup levels were developed for outdoor workers, construction workers, and trench/utility workers for soil, for construction workers and trench utility workers exposed to shallow groundwater, and for indoor workers potentially exposed to chemicals in indoor air volatilized from groundwater. For potential exposures related to the PROPERTY TO BE TRANSFERRED, the evaluation in the Cleanup Goals Memorandum was completed as follows:

- Proposed SSCLs were developed for relevant receptors (i.e., indoor worker, outdoor worker, construction worker, and utility worker).

- Concentrations of chemicals at each location were compared to the proposed SSCLs, and cumulative risks were estimated for each location.

- Locations were identified where cumulative risks across all chemicals exceeded 1×10^{-5} or a hazard index of 0.1.

This is a conservative approach designed to refine the spatial understanding of the distribution of chemicals in environmental media. The results for any one sample are likely to overestimate risk to an individual, since individuals do not stay in one place (i.e., they move around the property). Chemicals in soil and groundwater that exceed target risks and hazard indexes are present primarily on the eastern portion of the PROPERTY TO BE TRANSFERRED, with a much smaller area affected on the western portion of the property.

Ecological Risk Evaluation

The updated risk assessment prepared by the Permittees evaluated risks to ecological receptors related to hazardous constituents in soil, groundwater, and surface water. The objective of the Ecological Risk Assessment (ERA) portion of the BRA was to determine if releases from SWMUs pose unacceptable risks to environmental receptors under current and reasonably anticipated future land uses, and to provide information to support decisions concerning further evaluation or remedial action.

The ERA concluded that evaluation of direct exposures to COPECs in surface water, sediments, and riparian soils associated with the Blue River, Boone Creek, and Indian Creek ecological exposure areas posed no unacceptable risks to the viability and function of benthic invertebrates, fish, and terrestrial plant and invertebrate communities. For birds and mammals, the Blue River, Boone Creek, and Indian Creek ecological exposure areas were evaluated as a single combined exposure area. The ERA identified no unacceptable risks with respect to survival, growth, and reproduction of herbivorous, omnivorous, invertivorous or carnivorous, or piscivorous birds and mammals exposed to surface water, sediments, or riparian soils.

EPA reviewed and approved the ERA; however, as part of its review, EPA recalculated ecological risks based on conservative exposure scenarios in order to provide an independent evaluation of the potential range of risks associated with the ecological habitat at the BFC. EPA concluded, based on conservative exposure scenarios that PCBs, as they exist today in sediments, soil, and surface water, may represent a potential risk to the Belted Kingfisher and Great Blue Heron at the BFC. EPA also concluded that, as site redevelopment proceeds and the surface water outfalls are abandoned or reconfigured, these concerns in relation to continued PCB discharges to the streams via the outfalls on the PROPERTY TO BE TRANSFERRED will be addressed. EPA's conclusion in this matter does not pertain to the GSA RETAINED PROPERTY referenced in the following paragraph that is still undergoing investigation.

Independent evaluation of direct exposures to COPECs in creek/river sediments and soils associated with the Former Navy Landfill ecological exposure area, located on the GSA RETAINED PROPERTY, is being conducted by the USACE pursuant the FUDS program. It has not yet been determined what, if any, unacceptable risks exist relative to the viability and function of benthic invertebrates or terrestrial plant and invertebrate communities, or survival, growth, and reproduction of herbivorous, omnivorous, invertivorous, or carnivorous birds and mammals on this portion of the BFC.

PROPOSED CONTINGENT CORRECTIVE MEASURES AND EVALUATION CRITERIA

Under the current MHWMF Part I Permit and current use of the property, all final remedy elements are in place and are protective. In anticipation of future property redevelopment, a number of corrective measures were evaluated for the PROPERTY TO BE TRANSFERRED and areas beyond the facility property boundaries pursuant to 10 CSR 25-7.264(1), incorporating 40 CFR 264.101. This evaluation was premised on potentially unacceptable risks that could occur as a function of future redevelopment of the property by the private developer, as identified in the BRA and ToxStrategies Technical Memorandum. The proposed contingent corrective measures can be found in the CMR (SSP&A, April 2017) and includes, in part, continuation of previously implemented corrective measures contained in the 95th Terrace Corrective Measures Study (URS, 2004). Corrective measures comprising the proposed contingent remedy were evaluated relative to the following threshold and balancing criteria as required by the MHWMF Part I Permit and EPA's RCRA Corrective Action Plan (Final), OSWER Directive 9902.3, (May 1994):

- Overall Protection of Human Health and the Environment – The proposed remedy must provide for protection of human health and the environment based on reasonably anticipated land use, including any restrictions placed on use of the property.

- Attainment of Media Cleanup Standards – The proposed remedy must achieve media specific cleanup (protection) standards and objectives.

- Controlling the Sources of Releases – The proposed remedy must control the sources of releases so as to reduce or eliminate, to the extent practicable, further releases that may pose a threat to human health or the environment.

- Compliance with Standards for Management of Wastes – The proposed remedy must ensure that waste management activities associated with the proposed remedy are conducted in accordance with applicable local, state, and federal regulations.

The following “balancing” criteria were also considered:

- Long-term reliability and effectiveness.
- Reductions in waste volume, toxicity, and mobility.
- Short-term effectiveness, including consideration for protection of the community, workers, environmental impacts, and time for achievement of objectives.
- Implementability.
- Cost.

Following the public comment period and the public hearing about the proposed contingent remedy and associated proposed contingent modifications of the MHWMF Part I Permit, the Department will also consider the following additional criteria in making a final decision concerning the proposed contingent remedy and proposed contingent permit modifications:

- Community acceptance.
- Compliance with all applicable State regulatory requirements.

To achieve the corrective action objectives for protection of human health and the environment, potential corrective measures were considered to address the following risks that were identified in the above-referenced risk evaluation documents:

- Risk to construction workers.
- Risk to utility workers.
- Risk to future on-site workers from vapor intrusion.
- Risk to recreational users of Indian Creek and the Blue River.
- Risk to ecological habitat/receptors.

Through the screening process, the following corrective measures were identified to mitigate these risks.

- Excavation and off-property disposal of contaminated soils at appropriate permitted facilities.

- Emplacement of barriers (e.g. engineered caps, buildings, concrete, or asphalt pavement) to reduce precipitation infiltration through, and prevent direct contact with, residual contamination.

- Regrading of the PROPERTY TO BE TRANSFERRED, with up to 10 feet of additional clean fill above current grades.

- Continued groundwater monitoring and reporting.

- Extraction and treatment for containment of contaminated groundwater.

- Construction of low-permeability barrier walls to minimize groundwater contaminant plume migration.

- Removal and replacement of existing subsurface leaking water mains.

- Abandonment and plugging of storm and sanitary sewers that may currently be acting as conduits for contaminant migration.

- Installation of new utilities along routes to avoid known contamination to the greatest extent possible.

- Removal and plugging of regulated outfalls known to periodically be contributing low levels of PCBs to streams adjacent to the facility.

- Placement of fill between the embankments near Outfall 001 and Outfall 002.

- Installation of a new storm water system including detention basins, pre-discharge storm water treatment (for demolition phase), and four new discharge outfalls.

- Periodic collection of surface water, sediment, and fish tissue samples and analysis for PCBs in streams adjacent to the facility to assess long-term trends in those media as related to the effectiveness of related remedial actions, as required under current and future MHWMF Part I Permits.

- Maintenance of warning signs at storm water outfalls.

- Institutional Controls memorialized in a MoECA-compliant Environmental Covenant for the PROPERTY TO BE TRANSFERRED, as follows:

    - Soil management contingency plans;

- Establishment of land use restrictions to industrial/commercial purposes only, the nature of which are narrower than the uses currently allowed under the City of Kansas City's zoning.

- Continuation of land use restrictions preventing use of groundwater for domestic purposes; and

- Requirements for vapor mitigation measures to be installed in all new buildings, unless a case-by-case future demonstration that such measures are not necessary is submitted to and approved by the Department.

Detailed descriptions of the screening, evaluation, and selection of corrective measures can be found in the CMR and the 95th Terrace Corrective Measures Study (URS, 2004), which are part of the Administrative Record. These corrective measures build upon previous corrective actions that have been implemented at BFC since 1989. Previous measures have included excavation of contaminated soils; lining of storm water outfalls; diversion/treatment of storm water flows; extraction, treatment, and monitoring of contaminated groundwater; monitoring of surface water bodies (sediment, surface water, and fish tissue); and installation/maintenance of warning signage on Indian Creek in the vicinity of current Outfall 002.

PROPOSED CONTINGENT CORRECTIVE MEASURES

After considering the technical, human health, environmental, institutional, and cost criteria, the following corrective measures are proposed as the remedy for soil, groundwater, indoor air, and surface water/sediment/fish tissue contamination related to releases on the PROPERTY TO BE TRANSFERRED.

As indicated in the introduction to this Statement of Basis, the proposed permit modifications and proposed remedy are contingent on the transfer of that portion of the BFC lying west of the UPRR-ROW to the private developer. These proposed modifications and proposed remedy will not become effective until that property is legally transferred to the private developer and the Department and EPA have issued Class I Permit Modifications with prior Director approval for the transfer of ownership/operational control of that portion of the BFC.

If the BFC property lying west of the UPRR-ROW is not transferred to a private entity, the proposed permit modifications and proposed remedy actions discussed below shall become null and void, and the current Permittees shall continue to perform activities in compliance with the current MHWMF Part I Permit and HSWA Part II Permit.

Proposed Actions to Address Risks from Contaminated Soils:

- Soils in exceedance of the proposed cleanup levels identified in the ToxStrategies Technical Memorandum for construction worker and utility worker risk scenarios will be excavated to a depth of approximately12 feet below future surface grades, approximately 794 feet mean sea level for most areas of excavation. These soils will be disposed off-property at appropriately permitted hazardous waste or solid waste facilities.
    - Department 27 Area
        - Planned Excavation Depth: 6 feet below current grade.
    - Department 26 and Vicinity (SWMUs 9-11 and 31)
        - Planned Excavation Depth: 6 to 8 feet below current grade.
    - TCE Still Area (SWMU 2)
        - Planned Excavation Depth: 6 feet below current grade.
    - Waste Transfer Spill Area (SWMUs 3, 23, 27, and 37)
        - Planned Excavation Depth: 3 feet below current grade.
    - Building 15 Area
        - Planned Excavation Depth: 8 feet below current grade.
    - Former Western Pond (SWMU 6; borehole CP-2219 area)
        - Planned Excavation Depth: 9 feet below current grade.
    - Former NEA Pools (vicinity of boreholes CP-322/CP-322R and CP-5010)
        - Planned Excavation Depth: 6 feet below current grade.

  Final design of these excavation areas will be completed following pre-design investigation work and submission of post-transfer Corrective Measures Implementation (CMI) Work Plans to the Department for review and approval, pursuant to the modified MHWMF Part I Permit.

- Additional soils not in excess of the proposed SSCLs[4], but exhibiting odors and/or the residual petroleum product, are anticipated during demolition. These will also be removed when encountered and properly managed for off-property disposal.

- For SWMUs without previous "No Further Action" determinations, but no soils exceeding the proposed SSCLs, a request will be submitted that the SWMU status be altered to "No Further Action."

- SWMUs with the status of "Under Corrective Action" will be capped at or near current grade to reduce infiltration and potential human contact, and will be re-designated as "Corrective Action Complete - Final Controls in Place." Where future building slabs and pavement overlap with active SWMU boundaries, these structures will serve as supplemental caps that reduce infiltration and potential human contact. Any areas that have controls will require periodic inspection and maintenance to ensure that the controls remain effective over the long-term. Provisions for these activities will be included in the post-transfer CMI Work Plans.

- Facility grades will be raised across most of the transfer property, with 2 to 10 feet of additional clean fill, to facilitate storm water drainage and reduce potential for human contact with contaminated soil.

- Continued use of soil management plan(s) to properly manage potentially contaminated soils during on-site activities and use of appropriate personal protective equipment by workers involved in managing those soils.

<u>Proposed Actions to Address Risks from Contaminated Groundwater:</u>

- Extraction and treatment of groundwater for the purposes of plume containment will continue. This includes prevention of off-property impacts at or above the groundwater protection standards specified in the modified MHWMF Part I Permit, standards that are based on enforceable drinking water and Missouri water quality standards. This will be accomplished via (i) demolition-phase and (ii) post-demolition phase systems designed to minimize plume movements from their current configurations. Elements of the demolition-phase groundwater control system will include the following.

    - One new groundwater extraction trench southwest of Building 50, approximately 650 feet long.

[4] The SSCLs are proposed in the ToxStrategies Technical Memorandum, April 2017. They require approval by the Department following public review and comment and response to public comments, if any, to use as actual cleanup levels.

  - One new groundwater extraction trench east of Building 50, approximately 350 feet long.
  - Continued operation of the existing drain beneath the raceway at Outfall 001.
  - Up to 10 new extraction wells east and south of the demolition zone.

- Elements of the post-demolition, post-regrading groundwater control system will include the following.
  - The two groundwater collection trenches described above.
  - One new well to replace the existing drain near Outfall 001.
  - Up to 14 extraction wells (including a contingent well near Building 4).
  - Two new wells within the two enclosed barrier walls described below.
- Continued monitoring of groundwater to confirm containment of contamination, and conditions with respect to the point-of-compliance wells specified in the MHWMF Part I Permit.
- Construction of three low-permeability soil-bentonite barrier walls, and associated pumping wells, to limit migration of contaminants.
  - A low permeability barrier wall surrounding the former D26 and TCE Still Areas.
  - A low permeability barrier wall surrounding the former Waste Transfer Storage Area.
  - A linear, low permeability barrier wall to stop further migration of the northeast area groundwater plume, west of the UPRR-ROW.
- Removal and replacement of existing subsurface leaking water mains.
- Abandonment and plugging of storm and sanitary sewers that currently may be acting as conduits for contaminant migration.
  - Removal of all infrastructure and known utilities to a depth of approximately 12 feet below proposed future grades in areas west of the groundwater treatment system and 6 feet below current grades in areas to the east. Lines deeper than these vertical extents will be abandoned in place.

- Installation of new utilities along routes to avoid known contamination to the greatest extent possible.

Proposed Actions to Address Risks from Contaminated Surface Water Bodies:

- Removal, repurposing, or plugging of Outfalls 001, 002, 003, 004, B, C, and F. Unregulated Outfalls A and D will remain; however, site reconfiguration/regrading on the PROPERTY TO BE TRANSFERRED will ensure that flow from this property does not discharge to surface water via Outfall D.

- Placement of fill between the embankments near Outfall 001 and Outfall 002 to raise the grade and eliminate surface water discharge of potentially contaminated seep water.

- Installation of a new storm water system including detention basins, pre-discharge storm water treatment (for demolition phase), and four new discharge outfalls.

- Regrading of the transfer property with up to 10 feet of additional fill above current grades to minimize surface water contact with any remaining contaminated soil.

- Periodic collection of surface water, sediment, and fish tissue samples and analysis for PCBs, as required under the current and future MHWMF Part I Permits.

- Maintenance of warning signs along Indian Creek associated with current Outfall 002, until such time as future trend analyses for surface water, sediment, and fish tissue indicate that warning signs are no longer necessary.

Institutional Controls to be Memorialized in a MoECA-compliant Environmental Covenant:

- Soil management contingency plans.

- Establishment of land use restrictions for the PROPERTY TO BE TRANSFERRED to industrial/commercial purposes only, the nature of which are narrower than the uses currently allowed under the City of Kansas City's zoning.

- Continuation of land use restrictions preventing use of groundwater on the PROPERTY TO BE TRANSFERRED for domestic purposes.

- Requirements for vapor mitigation measures to be installed in all new buildings on the PROPERTY TO BE TRANSFERRED, unless a case-by-case future demonstration that such measures are not necessary is submitted to and approved by the Department.

EVALUATION CRITERIA

In accordance with EPA's RCRA Corrective Action Plan (Final), OSWER Directive 9902.3, (May 1994) and other guidance, proposed corrective measures were evaluated based on certain Performance Standards and Balancing Criteria. Following is the application of those Performance Standards and Balancing Criteria to the proposed corrective measures set forth above.

Performance Standards:

The proposed corrective measures must meet these four performance standards:

1. *Protection of Human Health and Environment:* Corrective action remedies must be protective of human health and the environment. A remedy is protective if it adequately eliminates, reduces, or controls all current and potential risks posed through each pathway of exposure. In addition, implementation of a remedy cannot produce unacceptable short-term risks to human health and the environment. If, after remediation, contamination remains at a facility such that unrestricted use and unlimited exposure are not allowable, engineering controls (e.g., capping or fences); institutional controls (e.g., zoning or deed restrictions); or some combination of the two must be implemented to control exposure and thereby provide reliable protection over time.

   The proposed corrective measures would be protective of human health and the environment and would provide protection by:

   - Demolition of buildings and utilities to a depth of approximately 6 to 12 feet below future surface grade to remove materials that may be sources of potential contamination.
   - Excavation of soil to approximately 12 feet below future grade where contaminants released to the environment during historical facility operations are in excess of SSCLs.
   - Capping residually contaminated soils that could pose a threat.
   - Source containment with enclosed and linear subsurface barrier walls and corresponding extraction wells.
   - Utility plugging or removal to eliminate potential preferential pathways for contaminated groundwater migration.
   - Outfall abandonment/plugging to eliminate ongoing sources of PCBs to surface water and creek/river sediment.

- Containment of contaminated groundwater by on-property extraction and treatment.

- Regrading of the PROPERTY TO BE TRANSFERRED and development of a new surface water conveyance system to eliminate storm water contact with residual contamination that may be present within existing storm water conveyance systems.

- Sampling/analysis and assessment of contaminant concentrations trends in groundwater, surface water, stream sediment, and fish tissue to verify compliance with the regulatory requirements.

- The MHWMF Part I Permit will continue to provide for protection of groundwater to drinking water standards beyond the permitted facility property boundaries, and surface water to Missouri Water Quality Standards in the streams adjacent to the facility.

- Implementation of institutional and engineering controls to limit potential contact with contaminated soil, groundwater, and soil vapor.

2. *Attain Media Cleanup Objectives:* Corrective Measures will be required to attain media cleanup standards set by the implementing agency, which are derived from the site-specific risk assessment documents and existing state and federal regulations/standards.

   The proposed corrective measures would meet media cleanup objectives by:

   - Excavation of shallow soil to approximately 12 feet below future grade where contaminants released to the environment during historical facility operations are in excess of SSCLs, and excavation is practicable.

   - Source containment with enclosed and linear barrier walls and corresponding extraction wells.

   - Utility plugging/removal/upgrade to eliminate potential preferential pathways for groundwater migration.

   - Outfall abandonment/plugging to eliminate ongoing sources to surface water and creek/river sediment.

   - Extraction and containment of contaminated groundwater.

3. *Control the Sources of Releases:* A critical objective of any remedy must be to stop further risk to human health and the environment. Unless source control measures are taken, efforts to clean up releases may be ineffective or, at best, will essentially involve a perpetual cleanup.

The proposed corrective measures would control the sources of releases by:

- Demolition of buildings and utilities to a depth of approximately 6 to 12 feet below future grade to eliminate potential source material and allow access to the subsurface to implement source control measures.

- Excavation of shallow soil to a depth of approximately 12 feet below future grade to remove soil with concentrations exceeding SSCLs.

- Enclosing the remaining primary groundwater source areas with low permeability barrier walls.

- Impeding off-property groundwater flow with linear barrier walls at the Northeast Area.

- Eliminating the source to surface water by abandoning the outfalls and adding fill that meets Department requirements.

4. *Comply with Applicable Standards for Management of Wastes:* All corrective measures must comply with state or federal regulations.

   The proposed corrective measures would comply with applicable standards for management of wastes and would include demolition, waste characterization, and management plans to ensure compliance with applicable local, federal, and state regulations, including the following examples.

   - Discharge collected/treated groundwater to the Kansas City, Missouri sanitary sewer system in accordance with applicable permits/requirements.

   - Discharge storm water through permitted outfalls in accordance with the Missouri State Operating Permit.

   - Manage/dispose of contaminated soils and other materials in accordance with applicable federal and state regulations and disposal facility requirements.

   - Obtain any of the Department's Water Protection Program permit needed for demolition activities (land disturbance).

   - Obtain any applicable permits from the City of Kansas City, Missouri, for demolition, new construction, and continued operation of the groundwater treatment facility.

   - Obtain any USACE consultation or approval, if required, for new storm sewer design and construction.

Balancing Criteria:

The five balancing criteria were considered in the evaluation of the proposed corrective measures:

- *Long-term Reliability and Effectiveness*: This criterion considers implementing remedies that provide protection of human health and the environment into the future, as well as in the near term. This analysis includes consideration of the following:

    - The effectiveness of the proposed corrective measures under similar property conditions.

    - The degree of threat posed by any contamination remaining on the PROPERTY TO BE TRANSFERRED.

    - Estimates of the projected useful life of the proposed corrective measures.

    - The operation and maintenance requirements of the remedy.

    - The adequacy and reliability of any controls (e.g., engineering or institutional controls) used to manage the hazardous substances remaining on the PROPERTY TO BE TRANSFERRED.

    - The potential impacts on human health and the environment if the remedy fails, based on assumptions included in the exposure scenarios.

  The proposed corrective measures provide long-term reliability and effectiveness through continuation of the types of actions that have proven to be reliable/effective historically, including groundwater extraction and treatment, soil capping, institutional and engineering controls, and sampling/analysis to assess contaminant concentrations and verify compliance with the regulatory requirements for groundwater, surface water, stream sediment, and fish tissue. Additional proposed actions go beyond current actions and include the following:

    - Installing subsurface low permeability barriers to provide containment of residual contaminant mass in soil that is a source to groundwater contamination

    - Excavating and off-site disposal of shallow contaminated soils.

    - More extensive soil capping.

    - Raising the surface grades.

- Installing barriers to potential vapor intrusion in all new buildings unless otherwise approved in the future as not necessary.

- Constructing new surface water conveyance systems to replace the existing outfall system.

- *Reduction of Toxicity, Mobility, and Volume through Treatment:* As a general goal, remedies will be preferred that employ techniques, such as treatment technologies, that are capable of eliminating or substantially reducing the inherent potential for environmental contamination to migrate further, cause further environmental releases, or other risks to human health and the environment.

  The proposed corrective measures achieve reduction in toxicity, mobility, and volume of contaminants over the long-term by excavating contaminated soil and properly disposing of it off-property, capping residually contaminated soils that are not excavated, and containment of groundwater with barrier walls and extraction and treatment. In addition, the proposed excavation/removal, plugging, and abandonment of utilities that could act as conduits for contaminant migration achieves reduction in mobility of contaminants.

- *Short-Term Effectiveness:* This criterion includes the short-term impacts of the proposed corrective measures (i.e., impacts during implementation) on the neighboring community, workers, and the surrounding environment, including potential threats to human health and the environment associated with treatment, excavation, transportation, and disposal of contaminated environmental media and building materials. The time required to achieve protectiveness is also considered.

  The proposed corrective measures will be effective in controlling risks during implementation through the use of temporary storm water and groundwater extraction systems during the demolition phase of the work. Final systems will be implemented in coordination with redevelopment. Short-term effectiveness will be verified with sampling/analysis and assessment of contaminant concentrations in groundwater, measurements of water levels to confirm continued capture of contaminants, and continued sampling of surface water, stream sediment, and fish tissue to verify compliance with the regulatory requirements. Noise, dust, and other control measures to be implemented during building demolition are outside the “official” scope of the corrective measures and will be addressed in detail in the building demolition plan(s).

- *Implementability:* Considerations include the technical and administrative feasibility of the proposed corrective measures. This analysis includes consideration of the following:

- The administrative activities needed to implement the proposed corrective measures (e.g. permits/permit modifications, off-site approval(s), and the length of time these activities will take).

- The constructability, time for implementation, and time for beneficial results.

- Any safety concerns associated with the remedy.

- The availability of adequate off-site treatment, storage capacity, disposal services, needed technical services, and materials.

- The availability of prospective technologies for the proposed corrective measures.

The proposed corrective measures are implementable and rely on technologies that are proven and readily available. More specifically, groundwater extraction and treatment, soil excavation, soil capping, and utility excavation/plugging/abandonment are widely used technologies, have been implemented previously at the BFC, and can be readily designed and implemented. The groundwater collection trenches and barrier walls are also widely used technologies. A one-pass trenching contractor has been identified, reviewed the facility conditions, and provided an estimated cost and schedule for implementing the work. Groundwater monitoring is performed routinely, and a monitoring well network already exists. A monitoring well replacement phasing work plan will be developed as part of the CMI Work Plans to ensure ongoing routine groundwater monitoring during the proposed facility demolition. Property activity and use restrictions (institutional controls) will be established in an Environmental Covenant which is enforceable by the Department and EPA pursuant to the Missouri Environmental Covenants Act.

- *Cost:* Costs encompass all construction and all operation, maintenance, and monitoring costs incurred over the life of a project. The cost of a remedy may be an appropriate consideration if several different remedial alternatives offer equivalent protection. Often, a Net Present Value analysis is useful to compare the cost of remedial alternatives.

  Appendix B of the CMR describes the evaluation and screening of multiple alternative corrective measures and technologies. But since the CMR specifically proposes contingent corrective measures to be implemented at the PROPERTY TO BE TRANSFERRED and applicable off-property areas, a Net Present Value analysis was not presented.

  The proposed corrective measures have an estimated total Capital Cost of $98,200,000 in 2016 dollars. However, this is only a tentative cost since $11,700,000 of that amount relates to vapor intrusion protection that may need to be installed in any new buildings. These costs include civil engineering components and some demolition components related to the corrective measures. However, facility demolition costs, including aspects related to

contaminated building materials, are excluded from this estimate and are being addressed separately. Operation, maintenance, and monitoring costs are estimated at $46,400,000 for years 1-30 collectively for the proposed contingent corrective measures.

The CMR presents the above described costs within the +50% to -30% range of accuracy, in accordance with EPA Guidance.

PRIOR INTERIM AND FINAL CORRECTIVE MEASURES SUMMARY

The environmental assessments and cleanup of the former KCP portion of the BFC began more than 30 years ago. Some release sites, such as the former underground tank farm and wastewater lagoons, were addressed in the 1980s when the DOE closed these units under Missouri's authorized (RCRA-equivalent) hazardous waste program. In 1989, DOE entered into a 3008(h) Order, administered by EPA, to address releases at the KCP portion of facility. In 1999, post-closure care, facility investigations, and corrective actions continued under the MHWMF Part I Permit and the 3008(h) Order was terminated.

Numerous interim and final measures were conducted in several areas throughout the KCP portion of the facility under the 3008(h) Order and MHWMF Part I Permit. These prior remedial actions included excavation of contaminated soils, containment and treatment of groundwater contamination, and replacement and lining of contaminated utility lines as follows:

- Removal of 49 underground storage tanks and related contaminated soil.
- Excavation of over 95,000 tons of contaminated soils.
- Installation (1989) and ongoing operation of a groundwater treatment/containment system that prevents contaminated groundwater from migrating off-site. This system has treated over 439 million gallons of contaminated groundwater and removed over 15,000 pounds of chlorinated solvents.
- Routine monitoring and maintenance of 200+ groundwater monitoring wells that ensures the groundwater collection and treatment system is effectively preventing off-site migration of contaminated groundwater.
- Replacement or re-lining of several thousand feet of storm sewer piping to prevent the infiltration of contaminants.
- Routine monitoring of surface water, sediment, and fish tissue quality in the creeks/rivers adjacent to the facility to assess reductions in contaminant loading to those water bodies.

- Maintenance of property access restrictions/security measures and implementation of property activity and use limitations and soil management plans to prevent potential exposure to residual subsurface contamination.

- Completion of numerous scientific studies to characterize contaminant sources and migration pathways.

- Implementation of remediation pilot studies (i.e., deep soil mixing and installation of a permeable reactive wall to treated contaminated groundwater) to assess potential broader application at the facility.

In addition to the above actions on the KCP portion of the BFC, a vapor intrusion mitigation system was installed in certain buildings on the GSA portion of the PROPERTY TO BE TRANSFERRED to address indoor air issues in buildings that were occupied at the time.

Table 1 of this Statement of Basis lists each SWMU and AOC, identifies the past corrective actions that have occurred at the SWMU unit, and provides the SWMUs and AOCs current corrective action status. In addition, an extensive summary of these remedial activities and the current conditions of the BFC is provided in a Description of Current Conditions Report (DCCR) (DOE & GSA, April 2017). Previous interim and final corrective measures were considered when proposing the additional actions contained in this Statement of Basis. The DCCR is available on Honeywell's website at honeywell.com/sites/aero-kcp/News-Events/Pages/DCCR.aspx.

FINANCIAL ASSURANCE

For the portion of the BFC that may be transferred to BT&D LLC, funding and financial assurance related to the activities required under the proposed contingent modifications to the MHWMF Part I Permit shall be sufficient to cover the remediation-related cost estimates contained in Table 7 and Appendix C of the CMR. The capital costs for remediation of the PROPERTY TO BE TRANSFERRED are estimated at $98,200,000 in 2016 dollars. This is only a tentative estimate since it includes $11,700,000 for vapor intrusion protection that may need to be installed in any new buildings. In addition, the cost of 30 years' worth of operation, maintenance, monitoring, and reporting for the PROPERTY TO BE TRANSFERRED is estimated at $46,400,000. Estimated total capital and long-term cost is $144,600,000 in 2016 dollars, potentially less up to $11,700,000 if vapor intrusion protection for new buildings is not needed.

Upon successful transfer of a portion of the BFC property to BT&D LLC, federal funds covering the capital costs for post-closure care and corrective measures to be implemented during years one through four will be placed in the BFC Remedial Fund, by NNSA, for later distribution as costs are incurred. In addition, the cost of operation, maintenance, monitoring, and reporting

during years one through four will be placed in the BFC Remedial Fund, by NNSA, for later distribution as costs are incurred. Use of the BFC Remedial Fund as the regulatory instrument for financial assurance is substantially equivalent to the trust fund option contained in 10 CSR 25-7.264(1), incorporating 40 CFR 264 Subpart H – Financial Requirements. The BFC Remedial Fund will be administered pursuant to the terms established in the Order for a portion of the BFC between the State of Missouri/Department of Natural Resources, BT&D LLC, and NNSA/DOE. In that document, NNSA/DOE and the State of Missouri/Department are named as BFC Remedial Fund beneficiaries in the event of default by BT&D LLC.

Operation, maintenance, and monitoring and post-closure care costs from and after year five following the effective date of transfer of a portion of the BFC to BT&D LLC, are a separate item that is not covered by the BFC Remedial Fund described above. The requirements and procedures for funding of these long-term costs are specified in the Order for a portion of the BFC.

With respect to the GSA RETAINED PROPERTY at the BFC, the current annual funding and financial assurance requirements under the MHWMF Part I Permit applicable to the federal parties will continue to apply to the GSA, as specified in the proposed contingent modifications to the MHWMF Part I Permit.

REGULATORY DISPOSITION OF MATTERS ADDRESSED BY THESE PROPOSED CONTINGENT PERMIT MODIFICATIONS

For the BFC, the Department prepared proposed contingent MHWMF Part I Permit modifications that incorporate the corrective action requirements explained in this Statement of Basis and in the CMR. When, and if, the modification is approved, the modified MHWMF Part I Permit will govern implementation of the proposed contingent remedy. EPA will not be modifying its HSWA Part II Permit as part of this modification, since that permit has no facility-specific corrective action conditions and Missouri is fully authorized for all permitting and corrective action activities at the facility. The contingent proposed remedy will be implemented following public review and comment on the proposed contingent permit modifications, the Department's response to any public comments and approval of the permit modifications, AND completion of an additional Class I Permit Modification with prior Director approval to transfer ownership of the PROPERTY TO BE TRANSFERRED from NNSA to a private entity. At the time of transfer, the HSWA Part II Permit will also need to be modified to recognize this transfer.

If the PROPERTY TO BE TRANSFERRED **is not transferred to a private entity**, the proposed contingent permit modifications and the proposed contingent remedy discussed herein shall become null and void and the current Permittees shall continue to perform activities in compliance with the current MHWMF Part I Permit and HSWA Part II Permit.

PUBLIC PARTICIPATION

The proposed contingent MHWMF Part I Permit modifications, proposed contingent remedy, and links to additional supporting documents are available on the Department's website at dnr.mo.gov/env/hwp/permits/mo9890010524/information.htm. The public can also review and copy the proposed contingent permit modifications and documents supporting the proposed contingent remedy at the following locations:

Mid-Continent Public Library*
Blue Ridge Branch
9253 Blue Ridge Blvd.
Kansas City, Missouri
Phone: 816-761-3382
*During normal business hours.

Missouri Department of Natural Resources*
1730 E. Elm St. (lower level)
Jefferson City, Missouri
Phone: 573-751-3043
*File reviews must be made through a sunshine request. Please visit dnr.mo.gov/sunshinerequests.htm.

U.S. Environmental Protection Agency, Region 7
Information Resource Center
11201 Renner Blvd.
Lenexa, Kansas
Phone: 913-551-7241
Hours: 9 a.m. to 3 p.m.--Monday - Friday (not including federal holidays)

Comments on the proposed contingent MHWMF Part I Permit modifications and proposed contingent remedy are more effective if they point out legal or technical issues or provide information that is not in the Administrative Record. Only the permit conditions being modified are open for public comment. At this time, we cannot consider any comments or suggestions regarding existing permit conditions that are not proposed to be modified. All other conditions of the existing MHWMF Part I Permit will remain in effect for the length of the continued permits, or until the Department or Permittees propose another permit modification, or until the permits are reissued. Please send written comments to:

Mr. Jalal El-Jayyousi, P.E.
Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176
E-mail: jalal.el-jayyousi@dnr.mo.gov

At the end of the public comment period, the Department will review all written comments and any comments given at the public hearing. We can change or deny the proposed contingent permit modifications or the proposed contingent remedy based on legal or technical issues

brought up by the comments. Written comments and oral public hearing testimony are treated with equal consideration. The Department will prepare a summary and response to all comments and explain how each was addressed in making a final decision regarding the proposed contingent remedy and proposed contingent permit modifications.

You may call or write the Department at any time to request to have your name placed on the facility mailing list. By doing this, you will receive notice from the Department or the Permittees on any major permitting and cleanup activities at the facility.

For more information on the proposed contingent remedy or proposed contingent MHWMF Part I Permit modifications, or to obtain a written or electronic copy of these proposals for review, please contact Mr. El-Jayyousi by telephone at 573-751-3553 or 800-361-4827. Hearing- and speech-impaired individuals may reach Mr. El-Jayyousi through Relay Missouri at 800-735-2966.

List of Exhibits

Exhibit 1	Map of 225 acres of BFC west of UPRR dnr.mo.gov/env/hwp/permits/mo9890010524/20170503-figure3.pdf
Exhibit 2	Draft Administrative Order on Consent honeywell.com/sites/aero-kcp/News-Events/Pages/PERMIT.aspx
Exhibit 3	List of Administrative Record Documents honeywell.com/sites/aero-kcp/News-Events/Pages/PERMIT.aspx
Exhibit 4	Time and location of Public Hearing dnr.mo.gov/env/hwp/permits/mo9890010524/information.htm