

1289-1 Fairfax Plant I
Kansas City, Kansas

Evaluation of Additional Areas Identified by KDHE for Remediation

Area SB-110 (Former Powerhouse Area – USTs 3 & 4)

According to reports prepared by Conestoga-Rovers & Associates (CRA) dated May 9, 2006 (Supplemental Confirmation Sampling Results) and February 19, 2007 (Additional Groundwater and Soil Sampling Data), the Tetrachloroethene (PCE) soil impacts in this area have been delineated through the completion of six soil borings (SB-118 through SB-122 and SB-137). The maximum PCE concentration detected was 0.45 mg/Kg at SB-119 @ 10-12 ft which is less than the Tier 2 Non-residential Soil Pathway Scenario of 140 mg/Kg, but greater than the Soil to Groundwater Tier 2 criteria of 0.18 mg/Kg. PCE has not been detected in groundwater in TMW-138 and MW-125 installed in this location or in other wells in this area.

Since the concentrations detected in soils have only exceeded the soil to groundwater Tier 2 criteria and groundwater has not been impacted, it is proposed to address this exceedance with the implementation of an environmental land use control to prohibit the use of groundwater beneath this property as a potable water supply and restricting use of the property to non-residential.

Area S-8 (UST 10 & Baler Room Area)

According to the CRA report dated April 2005 (Results of Confirmatory Sampling Program), and the Summary of Site Conditions report (July 2006), soil analysis completed for a boring (SB-113) drilled in the same location as SB-8 did not detect any VOCs above the Tier 2 criteria. In addition, the concentrations of PCE detected in the soils at SB-8 decreased with depth and were not detected at depths of 20, 25 and 30 feet below grade in this boring. The maximum PCE concentration detected was 2.5 mg/Kg at 10 feet in SB-8. Depth to groundwater is approximately 25 feet below grade in this area. Groundwater collected from S-8 contained 180 ug/L of PCE, 100 ug/L of trichloroethene (TCE) and 140 ug/L of total 1,2-dichloroethene (1,2-DCE), all of which exceed the Non-residential Groundwater Pathway risk based standards. Results for nearby wells (MW-109, MW-111) have also shown limited impact. However, similar to above, it is proposed to address these exceedances with the implementation of an environmental land use control to prohibit the use of groundwater beneath this property as a potable water supply and restricting use of the property to non-residential.

TMW-127 (Former Plant Building Investigation Area)

The CRA Additional Groundwater and Soil Sampling report dated February 19, 2007 indicates that ten soil samples collected from borings through the former footprint of the building (SB123 through SB-132) were analyzed for VOCs, SVOCs, and metals. All concentrations detected were less than the Tier 2 standards. The only VOC detected in groundwater collected from the temporary wells installed in nine of these borings was cis-1,2-DCE at 0.77 mg/L in TMW-127. While this concentration is greater than the Non-residential Groundwater Pathway Tier 2 standard of 0.07 mg/L, this data, along with the soil data, is not indicative of a source area. This compound is a degradation product of PCE and TCE, which have historically been detected in an upgradient, off-site monitoring well (MW-110A). The detection of this compound should be confirmed by additional monitoring of the wells in this area. Unless the concentrations are found to increase, it is proposed to address this exceedance with the implementation of an environmental land use control to restrict use of groundwater and the use of the property to non-residential.