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cc: Jnessa

Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, S.E., Suite 1470, Atlanta, Georgia 30334

Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

404-656-2833

December 21, 2006

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Michael W. Biering, P.E.
Director, Public Works
Headquarters, 3D Infantry Division (Mechanized) and Fort Stewart
Directorate of Public Works, Building 1137
Environmental Branch (ATTN: Algeana Stevenson)
1550 Frank Cochran Drive
Fort Stewart, GA 31314-4927

Jim

RE: Revised Final Compliance Status Report (CSR) for the former Fire Training Area (FTA) dated May 24, 2002; HSI # 10395; Hunter Army Airfield; EPA ID No. GA4 210 022 733.
Addendum to the Compliance Status Report (CSR) for the former Fire Training Area (FTA), dated April 2005; HSI # 10395; Hunter Army Airfield; EPA ID No. GA4 210 022 733.

Dear Mr. Biering:

The Hazardous Waste Management Branch of the Georgia Environmental Protection Division (GA EPD) is in receipt of the above-referenced documents submitted with correspondence (Biering to Hendricks) dated June 6, 2005. Based upon our review, GA EPD has generated the following comment(s):

1. *Acronym* – Chapter 1.0 of the Addendum to the CSR indicates that the northern part of the former FTA has been designated as “DAACG chlorinated solvent area”. Please explain the acronym DAACG.
2. *Section 391-3-19-.06(3)(b)(2) – Soil Delineation* – Soil contamination must be delineated to background concentrations for all VOCs detected above background within the DAACG area north of the former fire training area.
3. *Section 391-3-19-.06(3)(b)(2)(ii) – Analytical Parameters Selected and the Rationale for Selection* – The rationale for analyzing VOCs only must be expanded. Unless you can explain why no other regulated substances potentially exist at the site, additional samples should be collected and analyzed for metals, SVOCs, pesticides, and herbicides. We expect that approximately 20 additional soil samples and 10 groundwater samples collected from the former fire training area and the DAACG chlorinated solvents area would be sufficient to evaluate the potential presence of additional regulated substances.
4. *Section 391-3-19-.06(4)(a) and (b) – Compliance Certification* – The certification of compliance with the applicable risk reduction standards should be signed by the applicable person described in Items 1 through 4 of *Section 391-3-19.03(7)(c)*. The signature space was left blank.
5. *Section 391-3-19-.06(3)(b)(3) – Groundwater Delineation* – Groundwater must be delineated to background concentrations horizontally and vertically for all contaminants. Further sampling is required to complete delineation for the following constituents:

- a. 1,2-DCE, benzene, ethylbenzene, vinyl chloride, and xylenes need to be horizontally delineated northeast of COE-MW-02; and east and south of HMW-14R.
 - b. 1,2-DCE, and vinyl chloride need to be horizontally and vertically delineated northwest of COE-MW-06; and west and southwest of COE-MW-07.
6. *Sections 391-3-19-.06(3)(b)(2) and (3)(x)* – Please show data for all regulated substances in soil and groundwater on the maps. Further delineation may be required based on the revised figures.
 7. *Sections 391-3-19-.06(3)(b)(2) and (3)(x)* – Please include cross-sections for vertical delineation of soil and groundwater contamination.
 8. *Sections 391-3-19-.06(3)(b)(3)(x)* – Please indicate on the groundwater maps whether or not wells with no data boxes were sampled, even if they had no detections. Show the results as <DL (actual detection limit value), rather than BDL.
 9. *Section 391-3-19-.06(3)(b)(3)(viii)* – Maps – Please include isoconcentration lines on maps to show the horizontal extent of groundwater contamination.
 10. *Toxicity Factors* – EPD has noted some discrepancies between the toxicity values on Table 10 of the Addendum and those used by EPD. Please review the following list of toxicity factors for the corrected values.

	Revised CSR Value	EPD Value
Arsenic	SFi = No Value	SFi = 15 (mg/kg-day) ⁻¹ (IRIS)
Barium	RfDi = No Value	RfDi = 1.40E-04 (HEAST)

10. *Type 2 RRS for Soil- Lead* - As required by Section 391-3-19-.07(7)(c)(4) of the Hazardous Sites Response Rules, for lead, soil concentrations at the site must not exceed those concentrations that would cause a resident 6 year old child to have a probability of no greater than 5% of a blood lead level greater than 10 ug/dL as determined by the IEUBK model using site-specific exposure assumptions, including the ingestion of site groundwater as drinking water and the probability of subsurface soils being brought to the land surface. Please evaluate site lead RRS using the IEUBK model and submit all input parameters along with documented references.
11. *Type 2 and 4 RRS for Soil-Leaching Criteria* – Many of the Type 2 and 4 RRS for soil listed on Table 6.1 A and B of the revised final CSR are based on leaching criteria. Calculations for the leaching values were not included in the Addendum or the revised final CSR. Please provide the calculations for the leaching criteria along with documented references.
12. *Type 2 RRS for Groundwater* – The Type 2 RRS for groundwater listed on Table 10 of the Addendum for Arsenic and Barium are incorrect. Below are the correct RRS values and should be corrected in the Addendum.

REGULATED SUBSTANCE	REPORT VALUE	EPD VALUE (BASIS)
Arsenic	5.68E-04 mg/kg	1.11E-05 mg/kg (Carcinogenic Value- Adult)
Barium	1.10 mg/kg	2.9E-04 mg/kg (Non-Carcinogenic Value- Child)

13. *Type 4 RRS for Groundwater* – The Type 4 RRS for groundwater listed on Table 11 of the Addendum for Arsenic and Barium are incorrect. Below are the correct RRS values and should be corrected in the Addendum.

REGULATED SUBSTANCE	REPORT VALUE	EPD VALUE (BASIS)
Arsenic	1.91E-03 mg/kg	1.89E-05 mg/kg (Carcinogenic Value)
Barium	7.15 mg/kg	1.43E-03 mg/kg (Non-Carcinogenic Value)

14. Please submit one stand-alone document for the revised CSR, rather than a “Revised Final CSR” and an “Addendum CSR” separately. Include all updated text, figures, tables, appendices, and all historical data.

The revision for the former Fire Training Area CSR report, appropriately addressing the comment(s) above, should be submitted to GA EPD within ninety (90) days from receipt of this correspondence in the form of a totally revised document. Note that two (2) hard copies and two (2) electronic copies in pdf format following the attached guidance for electronic submittal are requested by GA EPD.

Should you have any questions concerning this correspondence, please contact Benoit Causse of my staff at 404-463-7513.

Sincerely,



Amy Potter
Unit Coordinator
Hazardous Waste Management Branch

Attachment (1)

c: Darrell Crosby, Manager, GA EPD-Coastal District
Tressa Rutland, Fort Stewart (via facsimile)

Hazardous Sites Response Program Document Submittal Format

All documents more than 25 pages in length shall be submitted as one paper copy and two compact disc (CD) copies with the documents in Portable Document Format (PDF). A signed certification page must be included in the CD copies. The certification page states that the electronic copy is complete, identical to the paper copy, and virus free.

All documents currently in electronic format should be converted into the PDF format. All documents not available electronically and pages that contain signatures, initials, or other information not in the electronic copy should be scanned into a PDF format including the signed certification page. Scanning should be at 200 dpi with any documents requiring color being scanned in color.

The document should be broken down into multiple PDF files along the following guidelines with the file name referenced in the table of content.

Table of Contents

Signature / Certification pages

Main body of document

Each Attachment (Appendices, Tables, Figures, Reports, etc.)

The CDs shall be enclosed in a jewel case. The CD shall be labeled with the following information written on the CD in indelible ink or affixed to the CD with an adhesive CD label.

Site Name

Site Address

HSI Number

City

County

Document Name

Document Date