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STATEMENT OF BASIS

**GEORGIA ENVIRONMENTAL
PROTECTION DIVISION**

PROPOSED ACTION FOR

INACTIVE EXPLOSIVE ORDNANCE DISPOSAL AREA LOCATED APPROXIMATELY NINE (9) MILES NORTHEAST OF GARRISON AREA

INACTIVE EXPLOSIVE ORDNANCE DISPOSAL AREA IN RED CLOUD RANGE, HOTEL AREA

INACTIVE EXPLOSIVE ORDNANCE DISPOSAL AREA NORTH OF GARRISON AREA

INACTIVE EXPLOSIVE ORDNANCE DISPOSAL AREA LOCATED APPROXIMATELY THREE (3) MILES NORTHEAST OF GARRISON AREA

**FORT STEWART
LIBERTY COUNTY, GEORGIA**

JUNE 2004

INTRODUCTION: Fort Stewart is currently operating under a Hazardous Waste Facility Permit issued by the Environmental Protection Division of the Georgia Department of Natural Resources under the authority of the Georgia Hazardous Waste Management Act, O.C.G.A Section 12-8-60, *et seq.*, as amended. Section IV of this Permit requires Fort Stewart to investigate solid waste management units which have released or have the potential to release hazardous constituents into the environment. The Inactive Explosive Ordnance Disposal Area located approximately Nine (9) Miles Northeast of the Garrison Area, the Inactive Explosive Ordnance Disposal Area in Red Cloud Range, Hotel Area, the Inactive Explosive Ordnance Disposal Area North of Garrison Area, and the Inactive Explosive Ordnance Disposal Area located approximately Three (3) Miles Northeast of Garrison Area meet this first criterion and are listed as Solid Waste Management Unit Nos. 8, 9, 10 and 11 in Appendix A of the Permit.

Fort Stewart completed investigation of these four Inactive Explosive Ordnance Disposal Areas and reported its findings in a Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management Units dated April 2000. In order to protect human health and safety from the contents of the four Inactive Explosive Ordnance Disposal Areas; corrective action is required, and the Georgia Environmental Protection Division has made a tentative decision to modify the facility's Permit in order to approve the:

- Corrective Action Plan for the Inactive Explosive Ordnance Disposal Area located approximately Nine (9) Miles Northeast of the Garrison Area, the Inactive Explosive Ordnance Disposal Area in Red Cloud Range, Hotel Area, and the Inactive Explosive Ordnance Disposal Area located approximately Three (3) Miles Northeast of Garrison Area dated May 2001; and
- Corrective Action Plan for the Inactive Explosive Ordnance Disposal Area North of Garrison Area dated July 2001.

PURPOSE: The purpose of this Statement of Basis is to solicit public involvement on the Georgia Environmental Protection Division's tentative decision prior to modification of the facility's Permit.

PROCEDURES FOR REACHING A FINAL DECISION: After the forty-five day public comment period closes, the Georgia Environmental Protection Division will make a final decision on these four Inactive Explosive Ordnance Disposal Areas. The agency will do so by sending a Notice of Decision, along with a written Response to Comments, to the facility and any person who submitted comments during the public comment period and/or requested notice of the final decision. In addition, the permit modification [reflecting that the two (2) Corrective Action Plans listed above for the four Inactive Explosive Ordnance Disposal Areas are approved] will become final upon issuance of the Notice of Decision.

PROPOSED ACTION: The Georgia Environmental Protection Division is proposing that the Corrective Action Plans for these four Inactive Explosive Ordnance Disposal Areas be approved based upon the investigation findings documented in the Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management Units dated April 2000. The Corrective Action Plans proposes a combination of land use restrictions prohibitions. Land use restrictions will be documented and/or enforced through deed recordation, the facility's Base Master Plan (i.e., "zoning" restrictions), signage, fencing and long-term operation and maintenance of the selected remedies. More detailed information concerning the proposed action for the four Inactive Explosive Ordnance Disposal Areas may be found in the Corrective Action Plan located in the Administrative Record.

BACKGROUND: The Inactive Explosive Ordnance Disposal Area located approximately Nine (9) Miles Northeast of the Garrison Area consists of almost 1.8 acres, mostly clear of trees and vegetation. The site is accessed by an unpaved road off of Tank Trail 57 which divides it into two sections approximately equal in area. Three blast craters and one open burning trench are located within the site's boundaries. Between 1983 and 1987, the Inactive Explosive Ordnance Disposal Area located approximately Nine (9) Miles Northeast of the Garrison Area was used for open detonation and open burning of excess or unused small arms rounds, artillery and mortar rounds pyrotechnics, bulk explosives, rockets, propellants, and hand grenades. These materials were generated when larger packages of small arms or explosives were opened but not consumed within the original operation. For safety and security reasons, they were not restocked but instead destroyed by burning or detonation.

The Inactive Explosive Ordnance Disposal Area in Red Cloud Range, Hotel Area, is located approximately eleven miles north of the garrison area and about 0.6 mile east of Georgia Highway 119. Open detonation of unexploded ordnance was performed from 1979 to 1983. The site is approximately one-tenth of an acre and consists of three blast craters, with the largest being approximately nine feet in diameter and three feet deep. There is a small amount of non-ordnance debris (e.g., dead trees, cans, plastic bottles) present within the craters. The vegetation at the site consists of some grasses, weeds and a few small trees. The Inactive Explosive Ordnance Disposal Area in Red Cloud Range, Hotel Area, has not reportedly been used for disposal of hazardous waste military munitions since 1983; however, it is within the boundaries of one of the more active armored vehicle firing ranges on the Fort Stewart Military Reservation. A site reconnaissance in September 1996, conducted with extreme caution, indicated that the amount of Explosive Ordnance Debris is a potential safety hazard. The potential waste disposed of includes excess artillery powder bags, small arms rounds, artillery and mortar rounds, illuminating projectiles, pyrotechnics, bulk explosives, rockets, propellants and regular smoke grenades. There are no records indicating disposal of chemical/biological agents, acids, solvents or other hazardous or toxic substances in the Inactive Explosive Ordnance Disposal Area in Red Cloud Range, Hotel Area.

The Inactive Explosive Ordnance Disposal Area North of Garrison Area operated from 1975 to 1980, with open detonation of unexploded ordnance taking place. The site is approximately one and three-quarters acres, fifteen hundred feet east of Taylors Creek and one mile east of Georgia Highway 119. A site reconnaissance in 1988 observed that the craters in the ground contained no solid waste other than small bits of shrapnel and that there was no evidence of ashes or charred ground from explosions.

The Inactive Explosive Ordnance Disposal Area located approximately Three (3) Miles Northeast of Garrison Area operated from 1953 to 1975, with open detonation of unexploded ordnance taking place. Numerous blast craters are spread out over nearly one acre. The entire site encompasses approximately 1.8 acres. This site is difficult to distinguish from the surrounding forest because it has become overgrown with trees and bushes. There are no surface water features located at this site. A site reconnaissance in November 1993 observed spent ammunition near the trenches/blast craters. Another site reconnaissance in September 1996 indicated evidence of previous Explosive Ordnance Disposal activities; however, no evidence of recent activities was observed.

RESULTS OF INVESTIGATION: Multiple, phased investigations of the these four Inactive Explosive Ordnance Disposal Areas were conducted between 1990 and 1999 and are documented in the Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management dated April 2000 and the two (2) Corrective Action Plans identified above. The field efforts during those investigations directly applicable to these solid waste management units included collection of sixty-one surface soil samples; two sediment and two surface water samples from two locations; and sixteen groundwater samples using Direct Push Technology. Although no hazardous constituents were detected in environmental media during the investigation at levels requiring corrective action, corrective action is required in order to protect human health and safety from the buried ordnance and/or contaminated

environmental media at the sites and because the contents of the four Inactive Explosive Ordnance Disposal Areas were not characterized to the degree which would allow unrestricted use of the site. More detailed information concerning the investigation for the units may be found in the report located in the Administrative Record.

ADMINISTRATIVE RECORD: Copies of the Fort Stewart Permit, Resource Conservation and Recovery Act Facility Investigation Report and the Corrective Action Plans described in this Statement of Basis are in the facility's Administrative Record and are available for public review. During the public comment period, the Administrative Record is available for public review at:

Georgia Environmental Protection Division
Hazardous Waste Management Branch
Floyd Tower East, Suite 1154
2 Martin Luther King Jr. Drive, S.E.
Atlanta, Georgia 30334
Monday - Friday; 8:00 a.m. to 4:30 p.m.
(404)656-2833

Liberty County Public Library
236 Memorial Drive
Hinesville, Georgia 31313
Monday - Thursday; 9:00 a.m. to 9:00 p.m.
Friday & Saturday; 9:00 a.m. to 6:00 p.m.
Sunday; 2:00 p.m. to 6:00 p.m.
(912)368-4003

OPPORTUNITIES FOR PUBLIC COMMENT: The Georgia Environmental Protection Division solicits input from the community on the proposed Corrective Action Plans for these four Inactive Explosive Ordnance Disposal Areas. The public is also invited to provide comments on any other aspect of the investigations at the units. The Georgia Environmental Protection Division has set a public comment period from July 18, 2004 through August 31, 2004 to encourage public participation in the selection process. Written comments must be received during the comment period and should be directed, in writing, to Jim Ussery at the following address.

Georgia Environmental Protection Division
Hazardous Waste Management Branch
Floyd Tower East, Suite 1154
2 Martin Luther King Jr. Drive, S.E.
Atlanta, Georgia 30334

For additional information regarding public participation, please contact Albert Wilson of the Georgia Environmental Protection Division at (404)656-2833.