Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King Jr. Dr., S.E., Suite 1154, Atlanta, Georgia 30334-9000
Judson H. Turner, Director
Land Protection Branch
Keith Bentley, Branch Chief
Phone: 404/656-2833 FAX: 404/651-9425

February 22, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Robert R. Baumgardt
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

RE: Fort Stewart's *SWMU Assessment Report, Polynuclear Aromatic Hydrocarbon Detection near SWMU-24B*; dated June 2011 and received July 19, 2011; EPA ID No. GA9 210 020 872.

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's SWMU Assessment Report (SAR) for the Polynuclear Aromatic Hydrocarbon (PAH) detection near SWMU-24B. The SAR states that the area where the PAHs were detected is being used as an active motor pool, and was previously paved with asphalt. The SAR concludes that the PAH detections in surface soil originate from the current use of this area as an active motor pool and the weathered and deteriorated old asphalt pavement, as evidenced by pictures provided in the SAR.

Historical sampling for PAHs within the motor pool area show sporadic results of elevated PAH detections. After a recent soil excavation/removal action for PAHs in 2010, confirmatory sampling resulted in one side-wall soil sample with PAH contamination above calculated remediation levels. No specific source of the PAHs has been identified, and the sporadic nature of historical detections appear to support the SAR's conclusion that the cause of the PAH detections originates from non-point sources such as stormwater runoff, motor vehicle operations, and deteriorated old asphalt. In addition, Fort Stewart has submitted an independent study of PAHs in urban surface soils conducted by the US Geologic Survey, which identifies asphalt pavement and the operation of motor vehicles as common sources of PAHs in urban area surface soils.

Because the levels of PAHs detected are above the acceptable residential risk-based levels, please submit a land-use control plan to ensure this area remains non-residential. Any change in land-use or construction upon this area will require further investigation of PAHs, and may require further action to remediate contamination. If you have any questions, please contact Mr. William Powell or Mr. Mo Ghazi at 404-656-2833.

Sincerely,

Amy Potter
Unit Coordinator
Hazardous Waste Management Program

c: Tressa Rutland, Fort Stewart (via e-mail)
File: Fort Stewart (G)
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