

10/24/01
JES

Georgia Department of Natural Resources

Environmental Protection Division

Underground Storage Tank Management Program

4244 International Parkway, Suite 104, Atlanta, Georgia 30354

Lonice Barrett, Commissioner

Harold F. Rebeis, Director

(404)362-2687

September 28, 2001

Colonel Gregory V. Stanley
U.S. Army/HQ 3rd Inf. Div. (Mech) and Ft. Stewart
Directorate of Public Works
1550 Frank Cochran Drive, Building 1137
Fort Stewart, GA 31314-4927

SUBJECT: **Review Information Leading to a Deficiency Determination of
Corrective Action Plan (CAP)-Part B:**
Hunter AAF, Former UST #117
Building 7002, Bulk Fuel Facility (HAA-09)
Savannah, Chatham County, GA
Facility ID: 9025113*1

Dear Colonel Stanley:

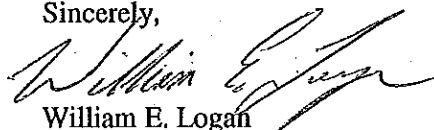
The Georgia Underground Storage Tank Management Program (USTMP) has received your letter, dated August 6, 2000, that forwarded a properly certified CAP-Part B. The report was prepared by Science Applications International Corporation (SAIC).

We have conducted a technical review of the CAP-Part B. The basis for this review is the Georgia Rules for Underground Storage Tank Management (GUST Rules, revised 1996). Our comments are outlined in the enclosure. Please amend the CAP-Part B to address these by November 9, 2001.

Unless one of the outlined EPD Comments requests otherwise, you are required to submit only your responses to these comments. Resubmittal of a complete CAP-Part B is not necessary.

If you have any questions, please contact me at (404) 362-2687.

Sincerely,



William E. Logan

Senior Geologist

Corrective Action Unit II

WEL:

s:/land/landdocs/williaml/pending01/9025113.15

Enclosure

cc with EPD comments: C. Allison Bailey, SAIC

Lisa L. Lewis, GA EPD

Mr. Larry Rogers, GA EPD Coastal District

File (CA): Chatham, 9025113

EPD Review Comments

**Corrective Action Plan (CAP)-Part B:
Hunter AAF, Former UST #117
Building 7002, Bulk Fuel Facility (HAA-09)
Savannah, Chatham County, GA
Facility ID: 9025113*1**

September 28, 2001

- a. ATL calculations do not yield a meaningful result and are not appropriate for the site. The contaminated soils are already below the water table and are in contact with groundwater (TPH 163 mg/kg at 5 feet deep. During tank closure contaminated soils were returned to the excavation). Depth to water table is < 5 feet. Request for monitoring only cannot therefore be based on the ATL calculation.
- b. Laboratory reports for soils are not originals. Please submit original lab reports with original signature of certification.
- c. Method 8270B is not a valid EPD approved testing Method for BTEX. Please resample by Method 8021G or 8260B and resubmit results. All future samples should be tested by 8021G and 8260B.
- d. Lab reports for groundwater are not originals and a signed certification of results has not been included. Please submit original lab reports together with signed laboratory certification. Please identify method used for groundwater analyses.
- e. The fate and transport model does not indicate the concentration at the source used for modeling purposes. Please indicate concentration values used at the source.
- f. The model does not indicate the assumed time of the release. Please indicate the date of release on which the model is based.
- g. It appears the maximum benzene concentration of the latest sampling event was used as the initial concentration prior to calibration. This should not be used as an initial concentration at the source. It is preferred that the current contaminant distribution not be used as the initial concentration prior to calibration.
- h. Please indicate which wells were used to calibrate and outline the details of the calibration process. Please designate 2 validation wells with values predicted by the model over the next 2 years, so that the model may be validated through the monitoring of the specified wells.