

# Georgia Department of Natural Resources

Environmental Protection Division  
Underground Storage Tank Management Program  
4244 International Parkway, Suite 104, Atlanta, Georgia 30354  
Noel Holcomb, Commissioner  
Carol A. Couch, Ph.D., Director  
(404) 362-2687

February 28, 2008

Algeana Stevenson  
U.S. Army/HQ 3<sup>rd</sup> Inf. Div. (Mech) and Ft. Stewart  
Directorate of Public Works  
1550 Frank Cochran Drive, Building 1137  
Fort Stewart, GA 31314-4927

**SUBJECT: Corrective Action Plan (CAP)-Part B  
Progress Report Review Comments:  
Hunter AAF, Former UST #117  
Building 7009, Bulk Fuel Facility (HAA-09)  
Savannah, Chatham County, GA  
Facility ID: 9025113\*2**

Dear Ms. Stevenson:

The Georgia Underground Storage Tank Management Program (USTMP) has received your consultant's letter, dated September 19, 2007, that forwarded a properly certified CAP-Part B Progress Report]]. 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 **June 30, 2008**.

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) 362-4529.

Sincerely,



William E. Logan  
Advanced Geologist  
Corrective Action Unit II

WEL;

S: land/landdocs/william/pend00/9025113R2&3. 15

Enclosure

cc with EPD comments: Patricia A. Stoll, P.E., SAIC  
Jim Guentert, GA EPD  
Lisa L. Lewis, GA EPD

File (CA): CHATHAM; 9025113

**DOCUMENT 12.1**

## EPD Review Comments

**Corrective Action Plan (CAP)-Part B  
Progress Report:  
Hunter AAF, Former UST #117  
Building 7009, Bulk Fuel Facility (HAA-09)  
Savannah, Chatham County, GA  
Facility ID: 9025113\*2 &3**

February 28, 2008

In reviewing the monitoring report (Progress Report), observed that previous figures were given new revision dates, but the report was lacking a current groundwater potentiometric map. It is assumed that activities associated with free product removal that there would be gauging of monitoring wells for free product as well as the collection of groundwater elevations and in turn potentiometric maps produced from that data. Please, submit a current potentiometric map

In reference to Release #2: In reviewing information concerning Release #2, the location of the release is cross-gradient to observed groundwater flow directions, lack of free product and high dissolved in the direction of AST 7009 and recorded free product adjacent too the AST and not in the perimeter monitoring wells. Release is from the AST. Recommend a manifold be installed so that high vacuum recovery events can be conducted without entering the bermed area.

In reference to Release #3: In reviewing information concerning Release #1 and 3, the location of Release#1 was upgradient to Former AST 7003 (Release #3), lack of free product and high dissolved in the direction of AST 7003 and historical gauging recorded greater thickness of free product adjacent too the AST than what was observed at UST 117. Release is from the AST. Recommend that an enhanced fluid recovery system be installed to recover free product.

In reference to Release #3, it was observed that a majority of the free product monitoring points (40 units) were dry at installation and noted that they were only advanced to a depth of 5 feet. In reviewing the given groundwater elevations (1/12/2005) presented in the submitted report would have been idea for 5 feet, but with the drought conditions? Also, the use of the monitoring wells from Release#1 would have addressed the suspected release. Free product would have been noticed when the monitoring wells that were associated with Release #1 when they were abandoned-it is assumed that groundwater levels were collected prior to abandonment of the those monitoring wells.

In reference to Release #2 and #3, will be transferred to Mr. Jim Guentert of the Solid Waste Program.

Address:

Georgia Environmental Protection Division  
Solid Waster Program  
Mr. Jim Guentert  
4244 International Parkway, Suite 104  
Atlanta, Georgia 30354