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Georgia Department of Natural Resources

Environmental Protection Division
Underground Storage Tank Management Program
4244 International Parkway, Suite 104, Atlanta, Georgia 30354
Lonice C. Barrett, Commissioner
Harold F. Reheis, Director
(404) 362-2687

November 16, 1998

Mr. John H. Spears
U.S. Army/HQ3d Inf. Div. (Mech.)
ATTN: AFZP-DEV (Spears)
Building 1139
Ft. Stewart, GA 31314-5000

SUBJECT: Determination of Deficiencies in
 Corrective Action Plan - Part A
 Building 4577 Area, USTs 232 & 233
 Engineer Road west of Po Valley Road
 Ft. Stewart, GA; Liberty County
 Facility ID: 9089061*1

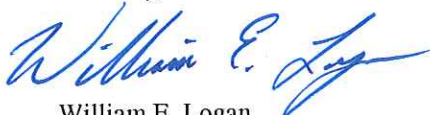
Dear Mr. Spears:

This is to acknowledge receipt of a properly-certified CAP- Part A Addendum dated July 30, 1998 for the subject site. The report was prepared by Science Applications International Corporation.

We have conducted a technical review of the CAP - Part A Addendum. The bases for this review are the CAP - Part A content requirements referenced in paragraph 391-3-15-.09(2) of the Georgia Rules for Underground Storage Tank Management (GUST Rules, revised 1995). Our comments on deficiencies are outlined in the enclosure. Please amend the CAP - Part A Addendum to correct these by January 16, 1999. Unless one of the outlined EPD Comments requests otherwise, you are required to only submit your responses to these comments as an revision to the original CAP - Part A addendum. Complete submittal of the CAP - Part A is not necessary.

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

Sincerely,



William E. Logan
Geologist
Corrective Action Unit II

WEL;
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cc: Lisa Lewis, GA EPD
Patricia Stoll, PE, SAIC
Larry Rogers, EPD Coastal District
File(CA): Liberty; 9089061

* * * UST Upgrade Deadline - December 22, 1998 * * *

EPD Comments

**Corrective Action Plan - Part A Addendum
Building 4577 Area, USTs 232 & 233 Site
Engineer Road west of Po Valley Road
Ft. Stewart, GA; Liberty County
Facility ID: 9089061*1**

November 16, 1998

1. The 1×10^{-4} target risk factor is not sufficiently conservative. If the standard 1×10^{-6} risk factor is substituted into the ACL calculation, the benzene ACL would be 9.9 ug/L, which is slightly above the 5 ug/L benzene MCL and well below the worst-case benzene analytical results for groundwater at the site. Therefore, an acceptable benzene ACL is 9.9 ug/L.
2. The Site Investigation Plan (Page III-1, Section A.2, Paragraph 2) states that "Waste oil and antifreeze, the substances released from the UST, are light nonaqueous phase liquids that are lighter than water and tend to spread laterally at the water table surface instead of migrating downward vertically." The only widely-used antifreeze with which EPD is familiar is ethylene glycol-based and is water soluble. Please indicate if antifreeze other than water-soluble, ethylene glycol-based was stored in the UST.
3. In light of the elevated benzene levels remaining in the source area, a minimum of three monitoring wells should be installed at the site to perform semiannual monitoring. Wells should be installed within and downgradient of the former tank excavation. The wells should be sampled for benzene, toluene, ethylbenzene and xylenes (BTEX), and fluid level measurement should be performed during each event. Please submit a technical proposal for semiannual site monitoring, along with a milestone schedule, with the revised CAP A Addendum.