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

December 18, 2000

Colonel Gregory V. Stanley 2.9 Dec 00 Director, Public Works U.S. Army/HQ3d Inf. Div. (Mech.) 1550 Frank Cochran Drive Ft. Stewart, GA 31314-4927

SUBJECT: Corrective Action Plan (CAP)-Part A Addendum Review Comments: Building 272 Area, UST #210 Site Bultman Avenue, West of E. 6th Street Ft. Stewart, Liberty County, GA Facility ID: 9089035*1

Dear Colonel Stanley:

This is to acknowledge your letter, dated July 31, 2000, that forwarded a response to comments and an amendment to the CAP-A, for our review. The Addendum was prepared by SAIC.

We have conducted a technical review of the CAP-Part A Addendum. The basis for this review is the Georgia Rules for Underground Storage Tank Management (GUST Rules, revised 1996). Our comments on deficiencies are outlined in the enclosure. Please amend the CAP-Part A Report to address these by January 18, 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 A Report is not necessary.

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

Sincerely,

William E. Logan

Geologist Corrective Action Unit II

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cc with EPD comments: Patricia Stoll, P.E., SAIC Lisa Lewis, GA EPD Larry Rogers, EPD Coastal District

File (CA): Liberty; 9089035

** * UST Compliance - a Key to a Cleaner Environment * * *

EPD Comments

Building 272 Area, UST #210 Site Bultman Avenue, West of E. 6th Street Ft. Stewart, Liberty County, GA Facility ID: 9089035*1

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It does not appear that adequate free product recovery efforts are being made, since there were no recovery efforts for 3 months between the discovery of the product in February 2000 and the installation of the sorbent. Then the well was not checked again for another month, when 5 gallons of product was recovered. No additional product removal activities appear to have been performed since the June 25th site visit and the July 31st submittal of the CAP-A Addendum. Please initiate more aggressive measures to remove the free product at the site. Considering the quantity of product present, weekly site visits to remove the product would be more appropriate.

2. Please also evaluate using Enhance Fluid Recovery (EFR) at the site to recover free product.