

# 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 Addendum  
Building 1161 Area, UST 61 Site  
West 4<sup>th</sup> Street West of McFarland Avenue  
Ft. Stewart, GA; Liberty County  
Facility ID: 9089104\*1

Dear Mr. Spears:

This is to acknowledge receipt of a properly-certified CAP- Part A Addendum from Mr. John H. Spears, dated July 30, 1998, that responded to Dr. Kenneth White's letter, dated March 19, 1998, on the CAP - Part A for the subject site.

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 addendum to the original CAP - Part A. 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;  
g:\landdocs\william\zina\tetra7\9089104.15  
cc: Lisa Lewis, GA EPD  
Patricia Stoll, PE, SAIC  
Larry Rogers, EPD Coastal District  
File(CA): Liberty; 9089104

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

## **EPD Comments**

**Corrective Action Plan - Part A Addendum  
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**November 16, 1998**

1. The  $1 \times 10^{-4}$  target risk factor is not sufficiently conservative. If the standard  $1 \times 10^{-6}$  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. Therefore, an acceptable benzene ACL is 9.9 ug/L.
2. 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. A technical proposal for semiannual site monitoring, along with a milestone schedule, should be presented in the revised CAP A Addendum.
3. Please provide an explanation for the values of aquifer depth (0.14 meters bgs), longitudinal dispersivity (30 meters), lateral dispersivity (10 meters) and vertical dispersivity (3.0 meters) used as input in the fate and transport model.