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FEB 16 2016

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

February 5, 2016

Mr. Robert R. Baumgardt
Director, Public Works
Headquarters, 3D Infantry Division (Mechanized) and Fort Stewart
Directorate of Public Works, Building 1137
Environmental Branch (ATTN: Algeana Stevenson)
1550 Frank Cochran Drive
Fort Stewart, GA 31314-4927

RE: Response to Comments for the *Nineteenth (19th) and Twentieth (20th) Corrective Action Plan Progress Reports, Former 724th Tanker Purging Station [Solid Waste Management Unit (SWMU) 26]*, Fort Stewart, Georgia; EPA ID No. GA9 210 020 872.

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's response to EPD's comments (Potter to Baumgardt dated July 2, 2015) and revised pages for the *Nineteenth (19th) Corrective Action Plan Progress Report*, dated March 2015 and received April 2, 2015, and *Twentieth (20th) Corrective Action Progress Report*, dated March 2015 (Revised October 16, 2015) and received December 8, 2015, for the Former 724th Tanker Purging Station [Solid Waste Management Unit (SWMU) 26]. From that review, it appears Fort Stewart has addressed EPD's comments. The final versions of these documents are considered complete and will be placed on file in our office.

The following concerns were identified during review of the above referenced documents.

- More than one of Fort Stewart's response to comments (RTCs) are based on or reference data, from the May and October 2015 sampling events, that have not yet been submitted to EPD. Please note that Corrective Action Plan Progress Reports (CAPPs) should be submitted within sixty (60) days following the end of the associated reporting period. We cannot evaluate your response without the data referenced in your response. Please base your responses only on data that has been made available to us at the time of the response.
- Groundwater monitoring wells MW-32, MW-41, and MW-47 were not sampled during multiple sampling events due to the presence of mud in the monitoring well. During the next sampling event, please redevelop and sample monitoring wells MW-32, MW-41, and MW-47. Additionally, based on the water sampling logs, turbidity exceeded 10 Nephelometric Turbidity Units (NTUs) in the majority of groundwater wells sampled. Elevated turbidity may be an indication that low flow sampling is not appropriate at this site, monitoring well redevelopment is required, or that the monitoring well was not adequately purged prior to sampling. During the next sampling event, please evaluate each monitoring well and redevelop, as needed, to ensure that all monitoring wells can be adequately purged (pH and

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specific conductance of the ground water have stabilized and the turbidity is below 10 NTUs) prior to low flow sampling in the future. Please note that stabilization occurs when, for at least three consecutive measurements, the pH remains constant within 0.1 Standard Units (SU) and specific conductance varies no more than 5 percent.

Should you have any questions, please contact Adam Hanley or Mo Ghazi at (404) 656-2833.

Sincerely,



Amy Potter
Unit Coordinator
Hazardous Waste Management Program

c: Tressa Rutland, Fort Stewart (via e-mail)

File: Fort Stewart (G)

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