

Georgia Department of Natural Resources

Environmental Protection Division-Land Protection Branch

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Judson H. Turner, Director

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May 25, 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 Veterans Parkway
Fort Stewart, GA 31314-4927

RE: 21st Corrective Action Plan Progress Report; SWMU 26-Former 724th Tanker Purging Station, 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 *SWMU [Solid Waste Management Unit] 26 Twenty-First Corrective Action Plan Progress Report; Former 724th Tanker Purging Station*, dated February 2016 and received February 26, 2016. EPD has generated the following comments.

1. **Site-Specific Remediation Goals for MTBE and Naphthalene.** Site-specific remediation goals (RGs) proposed in the 19th Corrective Action Plan Progress Report (CAPPR) for Methyl-Tert-Butyl Ether (MTBE) [59 micrograms per liter ($\mu\text{g/L}$)] and Naphthalene (6.1 $\mu\text{g/L}$) were approved in a letter dated February 5, 2016 (Potter to Baumgardt) which approved the 19th and 20th CAPPRs. Please use the approved RGs for MTBE and Naphthalene when preparing future CAPPRs.
2. **Sampling Program Modification.** Figure 3-6 depicts two separate areas of groundwater which exceed the RG for MTBE based on the analytical results from the May 2015 sampling event. However, monitoring wells MW-10, MW-37, MW-44, MW-45, and MW-46, located between these two areas, were not sampled in the May 2015 sampling event. Review of the historic analytical data for the site indicates that limited MTBE groundwater analytical data exists for these wells. Monitoring wells MW-37, MW-45, and MW-46 have been sampled once for MTBE in 2012 and monitoring wells MW-10 and MW-44 have never been sampled for MTBE. Please sample monitoring wells MW-10, MW-37, MW-44, MW-45, and MW-46 in the next two groundwater sampling events and use the resulting analytical data to evaluate the extent of MTBE contamination in groundwater at the site.
3. **Section 6. Conclusions and Recommendations.**
 - a. EPD concurs with Fort Stewart's recommendation to shut down the biosparge system for a minimum of 3 months prior to the October 2016 sampling event to evaluate residual mass quantity and distribution, natural attenuation without biosparge, and biosparge system optimization.

- b. EPD concurs with Fort Stewart's recommendation to redevelop monitoring wells MW-19, MW-31, MW-32, MW-41, MW-47, and MW-49, which were either not sampled due to the presence of mud or displayed high turbidity during recent sampling events.
4. **Section 4.4 Groundwater Quality Trends and System Performance – Deep Aquifer, Page 4-6.** The narrative description of the MTBE concentration trend data in the second to last paragraph of Section 4.4 on Page 4-6 is not consistent with the information provided on the *Summary of Statistical Analysis of Groundwater Analytical Data* table in Appendix F. For example, the table in Appendix F identifies three monitoring wells with increasing MTBE trends; however, the text only discusses two of these monitoring wells. Additionally, the statistical significance for the increasing trend observed in monitoring well MW-39 is inconsistently reported in the text and the table in Appendix F. Please revise the text or table accordingly.
5. **Table 3-3 Groundwater Analytical Data-April 2011 through September 2014.** Please make the following revisions to Table 3-3:
 - Update the title to reference the May 2015 groundwater analytical data; and,
 - Update the table notes to provide a definition for "NA".

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)

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