



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Land Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1054, East Tower
Atlanta, Georgia 30334
404-656-7802

RECEIVED

AUG 15 2018

August 7, 2018

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: Review of *Final Technical Memorandum 2017 Baseline Groundwater Monitoring Event and Revised Pages for Corrective Action Plan (Revision 1- June 2018)*, SWMU-39 Direct Support Maintenance Facility, Fort Stewart, Georgia.

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed the above referenced documents, which are supplemental to the original Corrective Action Plan (CAP) for SWMU-39 dated March 2016 and the red-line version dated May 2017. During that review, the following comments were generated:

Our main concern during the review of the March 2016 CAP was that the document was prepared using old data from the 2011 sampling event, and groundwater contamination in both the shallow and deep water bearing zones was not characterized completely. To fully characterize the contaminant plumes throughout the site, Fort Stewart conducted a baseline sampling event in July 2017. The results were provided in a Technical Memorandum dated February 2018. The results show that the concentrations of volatile organic compounds (VOCs) in groundwater decreased between the years 2011 and 2017, with the exception of the source area in the deep water bearing zone (i.e., monitoring well G4MW051). The latest analytical results suggest that the groundwater contamination is migrating downward. The concentration of Trichloroethylene (TCE) in monitoring well GMW041 was 550 µg/L in 2011, and 4.2 µg/L in 2017. Whereas, in monitoring well G4MW051, the TCE concentration was 380 µg/L in 2011 and 790 µg/L in 2017.

Considering the observed overall decrease in VOC concentrations, EPD is in concurrence with the following recommendations stated in the Recommendations section of the *Final Technical Memorandum 2017 Baseline Groundwater Monitoring* (page 5):

- Additional sampling of selected monitoring wells to confirm the 2017 data, particularly in the vicinity of the source area in the deep water bearing zone. Please note that if the results from the upcoming sampling event from the proposed 45 monitoring wells are significantly different from the 2017 data, modification to the proposed remedy should be considered.

Mr. Baumgardt
Fort Stewart
August 7, 2018
Page 2

- Monitoring the Arsenic concentration trend in select monitoring wells.
- Additional monitoring of undisturbed Light Non-Aqueous Phase Liquid (LNAPL) and use of absorbent socks for LNAPL recovery.
- Preparing a draft Work Plan (WP) in accordance with the CAP with Enhanced Reductive Dechlorination as the selected remedy. In preparing the WP, the locations of the injection wells, as well as the depth of the proposed injections, should be determined based on the most recent constituent of concern (COC) distribution.

The Corrective Action Plan for Solid Waste Management Unit (SWMU) 39, Direct Support Maintenance Facility dated May 2016, incorporating revisions received May 2017 and July 6, 2018, is tentatively approved. Please note that a final decision concerning the SWMU-39 CAP and subsequent revisions will be made by EPD after completion of a forty-five (45) day public comment period announcing out intent to approve the CAP and incorporate its contents into Fort Stewart's Hazardous Waste Facility Permit No. HW-045(S)-4.

If you have any questions, please contact Ms. Alayna Famble or Mr. Mo Ghazi at (404) 656-2833.

Sincerely,



Amy Potter
Unit Coordinator
Hazardous Waste Management Program

c: Tressa Rutland, Fort Stewart (via e-mail)
Algeana L. Stevenson, Fort Stewart (Via e-mail)

File: Fort Stewart (G)

S:\RDRIVE\AM GHAZI\All Sites\Ft Stewart\IRP Projects\SWMU 39\Concurrence EPD TM for baseline Sampling event 2017_18-July- 2017.doc