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Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, S.E., Suite 1470, Atlanta, Georgia 30334
Lonice C. Barrett, Commissioner
Environmental Protection Division
Carol A. Couch, Ph.D., Director
404/656-2833

July 8, 2004

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael W. Biering, Colonel, U.S. Army
Director, Public Works
Headquarters, 3D Infantry Division (Mechanized) and Fort Stewart
Directorate of Public Works, Building 1137
Environmental Branch (ATTN: Tressa Rutland)
1550 Frank Cochran Drive
Fort Stewart, GA 31314-4927

RE: Modifications to the Fort Stewart Hazardous Waste Facility Permit #HW-045(S&T); EPA ID No. GA9 210 020 872.

Dear Colonel Biering:

The Hazardous Waste Management Branch of the Georgia Environmental Protection Division (GA EPD) has made tentative decisions:

- (1) to delete Section I.H (Compliance Schedule) from the Fort Stewart Hazardous Waste Facility Permit #HW-045(S&T) (Permit) given that your facility has met the Conditions regarding installation of a new fence and gate around the boundary of the Explosive Ordnance Disposal Area which contains the permitted Miscellaneous Units;
- (2) to insert additional text in Permit Condition I.C.1 [i.e., "Sampling protocol shall follow the guidance as set forth in the most recent edition of the Environmental Protection Agency Region IV Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM)"];
- (3) to approve the Corrective Action Plan for Camp Oliver Landfill [Solid Waste Management Unit (SWMU) 2] dated March 2001 (See the attached Statement of Basis);
- (4) to approve the Corrective Action Plan for TAC-X Landfill (SWMU 3) dated March 2001, as amended (See the attached Statement of Basis);
- (5) to approve the Corrective Action Plan Corrective Action Plan for the Inactive Explosive Ordnance Disposal Area located approximately Nine (9) Miles Northeast of the Garrison Area, the Inactive Explosive Ordnance Disposal Area in Red Cloud Range, Hotel Area, and the Inactive Explosive Ordnance Disposal Area located approximately Three (3) Miles Northeast of Garrison Area (SWMUs 8, 9 & 11, respectively) dated May 2001 (See the attached

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Statement of Basis);

- (6) to approve the Corrective Action Plan for the Inactive Explosive Ordnance Disposal Area North of Garrison Area (SWMU 10) dated July 2001 (See the attached Statement of Basis);
- (7) to approve the Corrective Action Plan for the Industrial Wastewater Treatment Plant (SWMU 18) dated September 2001 (See the attached Statement of Basis);
- (8) to approve the Corrective Action Plan for the Evans Army Heliport Petroleum, Oil and Lubricants Storage Facility (SWMU 29) dated June 2001 (See the attached Statement of Basis);
- (9) to approve the Corrective Action Plan for the Wright Army Airfield Bulk Fuel System (SWMU 35) dated January 2002 (See the attached Statement of Basis); and
- (10) that No Further Action is required at the following twenty-eight SWMUs (See the attached Statements of Basis).

- Old Fire Training Area (SWMU 14)
- Defense Reutilization and Maintenance Office Hazardous Waste Storage Area (SWMU 17)
- Old Sludge Drying Beds (SWMU 19)
- 3rd Squadron 7th Cavalry Motor Pool and four (4) associated Oil/Water Separators (SWMU 27A)
- 1st BN, 3d ADA Motor Pool and associated Oil/Water Separator (SWMU 27B)
- 92d ECB (H) Motor Pool and associated Oil/Water Separator (SWMU 27C)
- 26th SPT BN Motor Pool and associated Oil/Water Separator (SWMU 27D)
- 703d SPT BN (Main) Motor Pool and associated two (2) Oil/Water Separators (SWMU 27E)
- DISCOM Motor Pool and associated Oil/Water Separator (SWMU 27G)
- DOL Maintenance Motor Pool and associated two (2) Oil/Water Separators (SWMU 27H)
- NGTC Block 9900, 10300 Motor Pool and associated two (2) Oil/Water Separators (SWMU 27I)
- GANG MATES Motor Pool and associated two (2) Oil/Water Separators (SWMU 27J)
- 3rd BN, 69th Armor Motor Pool Wash Rack and Oil/Water Separator (SWMU 27K)
- NGTC Block 10200 Wash Rack and Oil/Water Separator (SWMU 27L)
- NGTC Block 10100 Wash Rack and Oil/Water Separator (SWMU 27M)
- NGTC Block 9800 Wash Rack and Oil/Water Separator (SWMU 27N)
- NGTC Block 9700 Wash Rack and Oil/Water Separator (SWMU 27O)
- NGTC Block 9500 Wash Rack and Oil/Water Separator (SWMU 27P)
- NGTC Block 9400 Wash Rack and Oil/Water Separator (SWMU 27Q)
- 396 Transportation Company Wash Rack and Oil/Water Separator (SWMU 27R)
- Two (2) 103d MI BN Wash Racks and associated two (2) Oil/Water Separators (SWMU

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27S)

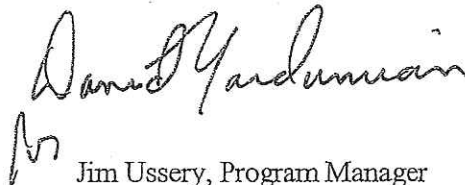
- 293 MP Company Wash Rack and Oil/Water Separator (SWMU 27T)
- Two (2) Wright Army Airfield Wash Racks and Oil/Water Separator (SWMU 27U)
- Auto Craft Center Oil/Water Separator (SWMU 27V)
- Directorate of Engineering and Housing Asphalt Tanks (SWMU 31)
- Supply Diesel Tank (SWMU 32)
- Directorate of Engineering and Housing Equipment Wash Rack (SWMU 34)
- National Guard Training Center Equalization Basin (SWMU 37)

Please note that the tentative decisions listed above have been incorporated into the Draft Permit attached to this correspondence. In addition, our tentative decisions are based upon the requirements set forth in the Georgia Hazardous Waste Management Act, as amended, O.C.G.A. §12-8-60, *et seq.*; and the Rules for Hazardous Waste Management, Chapter 391-3-11, promulgated pursuant thereto, as amended (Rules), Chapter 391-3-11, which incorporates by reference the Code of Federal Regulations found in 40 CFR Parts 124, 260-268, 270, 273 and 279.

Before making a final decision to incorporate these changes into the Fort Stewart Hazardous Waste Facility Permit #HW-045(S&T); Section 391-3-11 of the Rules requires GA EPD to provide an opportunity for public comment. Please note, in the attached Public Notice, that the forty-five (45) day public comment period will begin on July 18, 2004 and end on August 31, 2004. The attached Public Notice will be published in *The Savannah Morning News* on July 18, 2004, and a radio announcement will also be broadcast on WSSJ (FM) 92.3 1 twice a day for three consecutive days beginning July 19, 2004. In accordance with Section 391-3-11.11(4)(h) of the Rules, Fort Stewart will be billed for all costs associated with advertising of this Public Notice.

Should you have any questions concerning this correspondence, please contact Albert Wilson of my staff at (404)463-7513.

Sincerely,



Jim Ussery, Program Manager
Hazardous Waste Management Branch

Attachments(10)

c: Mr. Jon Johnston, EPA Region IV
Ms. Anita Shipley, EPA Region IV

File: Fort Stewart(Y)

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STATEMENT OF BASIS

**GEORGIA ENVIRONMENTAL
PROTECTION DIVISION**

PROPOSED ACTION FOR

OLD FIRE TRAINING AREA

DEFENSE REUTILIZATION AND MAINTENANCE OFFICE HAZARDOUS WASTE STORAGE SITE

OLD SLUDGE DRYING BEDS

DIRECTORATE OF ENGINEERING AND HOUSING ASPHALT TANKS

SUPPLY DIESEL TANK

DIRECTORATE OF ENGINEERING AND HOUSING EQUIPMENT WASH RACK

NATIONAL GUARD TRAINING CENTER EQUALIZATION BASIN

**FORT STEWART
LIBERTY COUNTY, GEORGIA**

JUNE 2004

INTRODUCTION: Fort Stewart is currently operating under a Hazardous Waste Facility Permit issued by the Environmental Protection Division of the Georgia Department of Natural Resources under the authority of the Georgia Hazardous Waste Management Act, O.C.G.A Section 12-8-60, *et seq.*, as amended. Section IV of this Permit requires Fort Stewart to investigate solid waste management units which have released or have the potential to release hazardous constituents into the environment. The Old Fire Training Area, Defense Reutilization and Maintenance Office Hazardous Waste Storage Area, Old Sludge Drying Beds, Directorate of Engineering and Housing Asphalt Tanks, Supply Diesel Tank, Directorate of Engineering and Housing Equipment Wash Rack and National Guard Training Center Equalization Basin meet this first criterion and are listed as Solid Waste Management Unit Nos. 14, 17, 19, 31, 32, 34 and 37 in Appendix A of the Permit.

Fort Stewart completed investigation of these seven units and reported its findings in a Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management Units dated April 2000. Because analytical results from environmental media samples collected at the solid waste management units evidence no hazardous constituents at levels which require corrective action or which pose an unacceptable risk to human health or the environment; the Georgia Environmental Protection Division has made a tentative decision to modify the facility's Permit to reflect that No Further Action is required at the Old Fire Training Area, Defense Reutilization and Maintenance Office Hazardous Waste Storage Area, Old Sludge Drying Beds, Directorate of Engineering and Housing Asphalt Tanks, Supply Diesel Tank, Directorate of Engineering and Housing Equipment Wash Rack and National Guard Training Center Equalization Basin.

PURPOSE: The purpose of this Statement of Basis is to solicit public involvement on the Georgia Environmental Protection Division's tentative decision prior to modification of the facility's Permit.

PROCEDURES FOR REACHING A FINAL DECISION: After the forty-five day public comment period closes, the Georgia Environmental Protection Division will make a final decision on these seven solid waste management units. The agency will do so by sending a Notice of Decision, along with a written Response to Comments, to the facility and any person who submitted comments during the public comment period and/or requested notice of the final decision. In addition, the permit modification reflecting that No Further Action is required at the Old Fire Training Area, Defense Reutilization and Maintenance Office Hazardous Waste Storage Area, Old Sludge Drying Beds, Directorate of Engineering and Housing Asphalt Tanks, Supply Diesel Tank, Directorate of Engineering and Housing Equipment Wash Rack and National Guard Training Center Equalization Basin will become final upon issuance of the Notice of Decision.

PROPOSED ACTION: The Georgia Environmental Protection Division is proposing that No Further Action is required at the Old Fire Training Area, Defense Reutilization and Maintenance Office Hazardous Waste Storage Area, Old Sludge Drying Beds, Directorate of Engineering and Housing Asphalt Tanks, Supply Diesel Tank, Directorate of Engineering and Housing Equipment Wash Rack and National Guard Training Center Equalization Basin based upon the investigation findings documented in the Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management dated April 2000.

BACKGROUND: The Old Fire Training Area is located on the southwestern boundary of the garrison area along Fort Stewart 90, north of Zouck's Cemetery and west of the engineering storage yard. During the 1940s and 1950s, crash response crews used this area for fire fighting training exercises and burning of waste oil and petroleum-contaminated water. This site has also been used for the storage of leaves and pine needles collected from the garrison area. In March 1987, the northwestern portion of the old fire training pit was reportedly actively burning or smoldering due to either spontaneous combustion or being set on fire. Waste oil, solvents and waste fuels were used at the site as fuel for fire training exercises.

The Defense Reutilization and Maintenance Office Hazardous Waste Storage Area is located in the southwestern garrison area between the west side of Building 1152 and the east side of the chain-link fence that surrounds the building and areas south and west of the building. The site is covered with concrete and asphalt and accessed by a paved road off the west side of Utility Street. The area was reportedly used for hazardous waste storage from 1985 to 1988. The storage area dimensions are approximately twenty-five feet by fifty feet. A site reconnaissance in November 1993 indicated that the area was used for storage of various non-trash, non-hazardous items. No evidence of leakage or a spill was observed. Site reconnaissances performed in 1996 and 1997 showed that the area is no longer being used to store hazardous waste. The waste stored at the site included lead-acid batteries that were palletized and covered, leaking drums of hazardous materials in overpack containers, spill cleanup residue in overpack containers, and drums of excess hazardous materials.

The Old Sludge Drying Beds are located in the north central portion of the garrison area in Block P5000, next to the old sewage treatment plant. Non-hazardous sludge from the domestic wastewater treatment plant was dewatered at this site from the 1960s to 1985. The drying beds were reportedly constructed of concrete and were approximately four to six feet deep. The present area of the Old Sludge Drying Beds is estimated to be half an acre. The Old Sludge Drying Beds were closed in 1989, prior to the existing requirements for closure. There is no documentation of the abandonment procedures, but it is reported that the dried, non-hazardous sludge was removed and disposed of in the installation's South Central Landfill. The drying beds were then backfilled with clean material.

The Directorate of Engineering and Housing Asphalt Tanks were located in the south garrison area near Utility Street and the railroad tracks. The tanks were used to hold cut-back asphalt for use on the installation. The history of operations for these tanks is unknown. Originally, there were three aboveground storage tanks located at the site. Two of the tanks were removed in 1993; the third one was a 20,000-gallon steel aboveground storage tank surrounded by an earthen berm that was removed in 1997. A site inspection in November 1993 indicated that the third aboveground storage tank was rusted and the paint was peeling, but there were no visible leaks. During the site inspection, a smaller aboveground storage tank (with a capacity of less than 5000-gallons), with rust and peeling paint, was also identified in the bermed area. This aboveground storage tank was used to hold water for the trains that came into the area. There were no visible holes in the smaller aboveground storage tank, and there was no visible staining of soils. The smaller aboveground storage tank remains at the site; however, it is no longer operational. The waste characterization for this site includes asphalt and its associated by-products.

The Supply Diesel Tank is located on the southern side of the garrison area near Utility Street between Buildings 1123 and 1121. There is one aboveground storage tank at the site that is surrounded by an earthen berm. It is unknown how long this aboveground storage tank has been in operation. Diesel fuel is the only product known to have been stored in this tank. Stained soil has been observed beneath the fill area. The aboveground storage tank has been observed to be in a rusted condition for several years and to have peeling paint on its surface. The aboveground storage tank was scheduled to be removed and replaced with a new state-of-the-art aboveground storage tank with built-in secondary containment in the spring of 2000.

The Directorate of Engineering and Housing Equipment Wash Rack is located within the south garrison area near the intersection of Utility Street and Bultman Avenue immediately northeast of Building 1124. The wash rack is forty feet wide by sixty-two feet long, with a grit chamber that is forty feet wide by eighteen feet long, and has been active since 1982. The wash rack consists of a sloped concrete pad that conveys wash water to a collection channel that then conveys

the water to the grit chamber. Wash water flows from the grit chamber to an oil/water separator. The effluent from the oil/water separator discharges to the sanitary sewer maintained by the Hinesville Publicly Owned Treatment Works. The oils collect in the holding tank of the oil/water separator are pumped out and burned at the installations Central Energy Plant. The waste characterization for this site includes soils, miscellaneous debris (e.g., bottles and rags), oils, greases, and antifreeze (i.e., strictly items used in washing vehicles and residues that will wash off vehicles).

The National Guard Training Center Equalization Basin is located in Block 9100 south of Troupe Avenue. The site encompasses approximately 0.8 acres. The system consists of a pump station, the National Guard Training Center Equalization Basin, and an overflow and outlet drain. The National Guard Training Center Equalization Basin was constructed of native soil taken from a spoil area adjacent to the site. The interior of the basin is lined with sandbag rip-rap. The basin receives wastewater from oil/water separators and wash racks that support the motor pools in the area (i.e., the 200 Block located on Bultman Avenue). Influent wastewater enters a pump station, at which the majority of the oil is separated from the water. The wastewater is then pumped to the National Guard Training Center Equalization Basin for temporary storage and for prevention of excess loads on the sanitary sewer system during rainfall events. The effluent from the basin is discharged to the sanitary sewer system. The separated oil is collected from the pump station on a routine maintenance schedule and burned at the Fort Stewart Central Energy Plant.

INTERIM MEASURES: As determined by the investigation for the Directorate of Engineering and Housing Asphalt Tanks, contamination was essentially confined to surface soil within and along the bermed area and to a depth of four to six feet at Sampling Location No. GP6. With our concurrence, Fort Stewart performed an Interim Measures at the Directorate of Engineering and Housing Asphalt Tanks on April 12-20, 1999. The Interim Measures included removal of one aboveground storage tank and associated concrete supports, one abandoned utility pole, approximately twenty railroad ties, and an estimated seventeen hundred and thirty cubic yards of soil. After the tank was removed, the earthen berm surrounding the site was removed, and an excavation area approximately two hundred and seventy feet long by thirty feet wide was created. The site was excavated to an estimated depth of three feet below ground surface, except for an area of approximately one hundred square feet which was excavated to an estimated depth of eleven feet below ground surface. Twelve subsurface soil and one groundwater confirmatory samples were collected, and the site was backfilled, seeded and mulched with approximately sixty bales of hay. More detailed information concerning the investigation for the units and the Interim Measures for the Directorate of Engineering and Housing Asphalt Tanks may be found in the Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management Units dated April 2000 located in the Administrative Record.

RESULTS OF INVESTIGATION: Multiple, phased investigations of these seven solid waste management units were conducted between 1987 and 1999 and are documented in the Phase II Resource Conservation and Recovery Act Facility Investigation Report for Sixteen Solid Waste Management dated April 2000. The field efforts during those investigations directly applicable to these solid waste management units included collection of sixty-five surface soil samples; fifty-six subsurface soil samples; two sediment and two surface water samples from two locations; four sediment and four wastewater samples from eight locations in the National Guard Training Center Equalization Basin; and seventy-five groundwater samples from forty-one locations using Direct Push Technology and from twenty permanent monitoring wells. Evaluation of the analytical results from environmental media samples collected at these solid waste management units evidence no hazardous constituents at levels which require corrective action or which pose an unacceptable risk to human health or the environment. More detailed information concerning the investigation for the units may be found in the report located in the Administrative Record.

ADMINISTRATIVE RECORD: Copies of the Fort Stewart Permit and Resource Conservation and Recovery Act Facility Investigation Report described in this Statement of Basis are in the facility's Administrative Record and are available for public review. During the public comment period, the Administrative Record is available for public review at:

Georgia Environmental Protection Division
Hazardous Waste Management Branch
Floyd Tower East, Suite 1154
2 Martin Luther King Jr. Drive, S.E.
Atlanta, Georgia 30334
Monday - Friday; 8:00 a.m. to 4:30 p.m.
(404)656-2833

Liberty County Public Library
236 Memorial Drive
Hinesville, Georgia 31313
Monday - Thursday; 9:00 a.m. to 9:00 p.m.
Friday & Saturday; 9:00 a.m. to 6:00 p.m.
Sunday; 2:00 p.m. to 6:00 p.m.
(912)368-4003

OPPORTUNITIES FOR PUBLIC COMMENT: The Georgia Environmental Protection Division solicits input from the community on the proposed No Further Action decision for the Old Fire Training Area, Defense Reutilization and Maintenance Office Hazardous Waste Storage Area, Old Sludge Drying Beds, Directorate of Engineering and Housing Asphalt Tanks, Supply Diesel Tank, Directorate of Engineering and Housing Equipment Wash Rack and National Guard Training Center Equalization Basin. The public is also invited to provide comments on any other aspect of the investigations at the units. The Georgia Environmental Protection Division has set a public comment period from July 18, 2004 through August 31, 2004 to encourage public participation in the selection process. Written comments must be received during the comment period and should be directed, in writing, to Jim Ussery at the following address.

Georgia Environmental Protection Division
Hazardous Waste Management Branch
Floyd Tower East, Suite 1154
2 Martin Luther King Jr. Drive, S.E.
Atlanta, Georgia 30334

For additional information regarding public participation, please contact Albert Wilson of the Georgia Environmental Protection Division at (404)656-2833.