

DECISION DOCUMENT FOR FTSW-006-R-1

Transmittal letter sent to GA EPD w/ RTC dated	November 20, 2012
Transmittal letter sent to GA EPD requesting extension dated	October 9, 2012
EPD letter received w/ comments dated	August 10, 2012
Transmittal letter sent to GA EPD dated	April 9, 2012



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, FORT STEWART/HUNTER ARMY AIRFIELD
DIRECTORATE OF PUBLIC WORKS
1587 VETERANS PARKWAY
FORT STEWART, GEORGIA 31314-5048

REPLY TO
ATTENTION OF

Office of the Directorate

NOV 20 2012

CERTIFIED MAIL

70101870000230071201

Georgia Environmental Protection Division
Attention: Ms. Amy Potter
2 Martin Luther King Jr. Drive, Southeast
Floyd Towers East, Suite 1452
Atlanta, Georgia 30334

Dear Ms. Potter:

Fort Stewart is pleased to receive Georgia Environmental Protection Division's letter dated August 10, 2012 regarding the Final Preliminary Investigation/TCRA (Time-Critical Removal Action) for the Small Arms Range Berm Area of MMRP (Military Munitions Response Program) Site FTSW-006-R-01, Fort Stewart, Georgia, dated March 2012.

In response to comments, Fort Stewart has enclosed two (2) hard copies and one (1) electronic copy of the (Revised) Final Preliminary Investigation/TCRA for the Small Arms Range Berm Area of MMRP Site FTSW-006-R-01, Fort Stewart, Georgia, dated November 2012 as well as one (1) additional electronic copy of the requested Work Plan.

In accordance with the Federal Code of Regulations, Section 270.11(d), the following certification is provided by the Installation:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or comments regarding the enclosed report, please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works, Environmental Division, Prevention and Compliance Branch at (912) 767-2010.

Sincerely,

Robert R. Baumgardt
Director, Public Works

Enclosures



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, FORT STEWART/HUNTER ARMY AIRFIELD
DIRECTORATE OF PUBLIC WORKS
1587 VETERANS PARKWAY
FORT STEWART, GEORGIA 31314-5048

REPLY TO
ATTENTION OF

Office of the Directorate

October 9, 2012

CERTIFIED MAIL

701018700002 3007.1164

Georgia Environmental Protection Division
Attention: Ms. Amy Potter
2 Martin Luther King Jr. Drive, Southeast
Floyd Towers East, Suite 1452
Atlanta, Georgia 30334

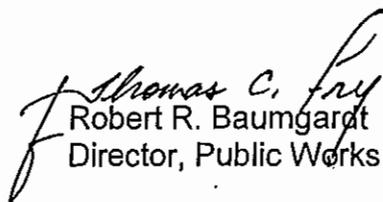
Dear Ms. Potter:

Fort Stewart is pleased to receive Georgia Environmental Protection Division's (GA EPD) letter dated August 10, 2012 regarding the Final Preliminary Investigation/TCRA for the Small Arms Range Berm Area of MMRP Site FTSW-006-R-01, Fort Stewart, Georgia, dated March 2012.

Fort Stewart respectfully requests an extension until November 15, 2012 to respond to GA EPD comments.

If you have any questions, please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works, Environmental Division, Prevention and Compliance Branch at (912) 767-2010.

Sincerely,


Robert R. Baumgardt
Director, Public Works

Georgia Department of Natural Resources

2 Martin Luther King Jr. Dr., S.E., Suite 1154, Atlanta, Georgia 30334-9000
Mark Williams, Commissioner
Environmental Protection Division
Judson H. Turner, Director
Land Protection Branch
Keith M. Bentley, Branch Chief
Phone: 404/656-7802 FAX: 404/651-9425

August 10, 2012

CERTIFIED MAIL **RETURN RECEIPT REQUESTED**

Mr. Robert R. Baumgardt
Director, Public Works
Headquarters, Third Infantry Division (Mechanized) and Fort Stewart
Directorate of Public Works, Building 1137
Environmental Division, Prevention, and Compliance Branch
ATTN: Algeana Stevenson
1587 Frank Cochran Drive
Fort Stewart, Georgia 31314-4927

RE: *Final Preliminary Investigation/TCRA [Time-Critical Removal Action] for the Small Arms Range Berm Area of MMRP [Military Munitions Response Program] Site FTSW-006-R-01, Fort Stewart, Georgia, dated March 2012 and received April 12, 2012.*

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's *Final Preliminary Investigation/TCRA for the Small Arms Range Berm Area of MMRP Site FTSW-006-R-01*, dated March 2012 and received April 12, 2012. Based on our review, EPD has generated the following comments:

1. **Acronyms and Abbreviations.** Please include the acronym 'MMRP' as it is not included on the list.
2. **Section 5, Figures.** In this report, the figures are placed after corresponding text. This results in as little as one page (See Page 40) of text residing between multiple bulky figures, making the document very difficult to read. Please relocate all figures in Section 5 into a separate appendix, and renumber all pages for Section 5 accordingly.
3. **Use of CERCLA Terms (TCRA).** The report references time critical removal actions due to active military construction (MILCON). The referenced TCRAs (a CERCLA term) appear to be more in line with interim corrective measures (i.e., RCRA term). Since Fort Stewart is a RCRA permitted facility, RCRA terms should be used in the report. Please revise accordingly.
4. **Soil-To-Groundwater Leaching.** Soil leaching to groundwater has not been evaluated. Please develop site-specific Soil Screening Levels (SSL) derived from using either Equations 4-10 or 4-14 from the Supplemental Guidance for Developing Soil Screening Levels for Superfund Sites

(USEPA, December 2002) or an acceptable analytical test method such as Synthetic Precipitation Leaching Procedure (SPLP) to evaluate the potential for constituents detected in subsurface soil to leach to groundwater. The use of EPA's Soil-to-Groundwater SSLs from the Regional Screening Level (RSL) tables will not be acceptable due to the shallow water table (< 10' below ground surface) and sandy soil (approximately 80% sand). Additionally, when calculating leaching values, please use the MCL (when available) as the target groundwater concentration in lieu of the EPA Tap Water RSL. Please evaluate subsurface soil for leaching to groundwater and incorporate the results of that evaluation into the report, or identify this as a data gap that requires evaluation.

5. **Field Sampling Collection.** Please provide the field sampling collection methods and procedures for technical review. Samples should be collected in accordance with EPA's Field Branches Quality System and Technical Procedures found at website <http://www.epa.gov/region4/sesd/fbqstp/>.
6. **Groundwater sampling logs.** Please provide the groundwater sampling/well purging logs in an appendix for technical review.
7. **Section 1 (Final Work Plan).** Report states that all work was conducted in accordance with *Final Work Plan for Site Investigation at the Small Arms Range Berm Area Fort Stewart, Georgia* (SES, Revised July 2010). This document was not submitted to EPD for approval. Please provide a CD copy of this work plan.
8. **Section 3, Source Description, and Figure 5-3.** In the last paragraph on page 3, the report states, "A pond is to the northwest of the berm area. This pond was formed when soil was borrowed to form the berm. To the southeast of the berm is a ditch that exhibits seasonal fluctuations in water level." Please modify Figure 5-3 (and reference in Section 3) to show where the locations of the ditch and the pond are relative to the berm.
9. **Sections 5.1 through 5.13.** These sections reference figures and tables for all sample results, but give no summary of those results. In each of these subsections (5.1 through 5.13), please summarize the findings for Lead, Copper, and Antimony to include the following:
 - Purpose of each sample event (if not included);
 - Number of samples taken for each media;
 - Number of samples that exceeded EPA RSLs for each media (surface soil, groundwater, etc.);
 - Range of detected concentrations for each metal in each media; and
 - Indicate whether the sample results warranted additional investigation or triggered removal actions.
10. **Section 5.12, Groundwater Sampling September 2010.** This section states that USACE abandoned four monitoring wells (MW-01, -02, -03, and -04). It does not include how these wells were abandoned to determine compliance with the Georgia Water Well Standards Act. Please provide this information.

11. **Section 6, Data Evaluation.** The August 2010 soil removal and confirmatory sample results are missing from this section. Please include a summary of this in Section 6.
12. **Section 7, Conclusions and Recommendations - Data Gaps.** Please include a section discussing remaining data gaps. Remaining data gaps should include, but not be limited to:
 - The disposition of the berms for the A Range, N Range, and HBANM Range; and
 - The uninvestigated soil and groundwater within the A Range, N Range, and HBANM Range.
13. **Section 7, Conclusions and Recommendations.** There are no recommendations as to whether the site requires additional investigation such as a RCRA Facility Investigation (RFI). In light of the data gaps noted above, it appears additional investigation is warranted. Please provide appropriate conclusions and recommendations based upon the findings.
14. **Section 7, Conclusions and Recommendations, Page 93.** This section states, " This pond has been removed by MILCON [military construction] activity. This removed the source of the surface water." No details of the pond removal have been provided. Please add a section discussing the removal of the pond (located on the west side of the berm), and provide a figure showing the most current depiction of the area. Additionally, please provide information with respect to the surface water Lead contamination in the ditch area located on the east side of the berm.
15. **Appendix F, Regional Screening Level Summary Table.** Appendix F includes the November 2010 RSL Summary Table. This report is dated March 2012. Please attach the most current RSL table (i.e., November 2011) that corresponds to the date of this report.

Within sixty (60) days after receipt of this letter, please submit two (2) copies of all revisions that address the above comment to the revised document, and one (1) electronic copy (in PDF format) of the full report. The revised pages should be noted at the bottom with the word "Revised" and the revision date. Should you have any questions, please contact Mr. Mo Ghazi or Mr. William Powell at (404) 656-2833.

Sincerely,



Amy Potter
Unit Coordinator
Hazardous Waste Management Program

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

File: Fort Stewart, Georgia (G)

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DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, FORT STEWART/HUNTER ARMY AIRFIELD
DIRECTORATE OF PUBLIC WORKS
1587 FRANK COCHRAN DRIVE
FORT STEWART, GEORGIA 31314-5048

REPLY TO
ATTENTION OF

Office of the Directorate

April 9, 2012

CERTIFIED MAIL

70102780000144281876

Georgia Environmental Protection Division
Attention: Ms. Amy Potter
2 Martin Luther King Jr. Drive, Southeast
Floyd Towers East, Suite 1452
Atlanta, Georgia 30334

Dear Ms. Potter:

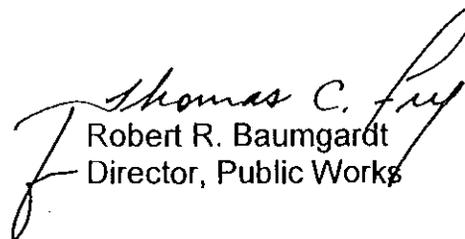
Fort Stewart is pleased to submit to the Georgia Environmental Protection Division two (2) hard copies and one (1) electronic copy of the Final Preliminary Investigation/TCRA for the Small Arms Range Berm Area of MMRP Site FTSW-006-R-01, Fort Stewart, Georgia, dated March 2012.

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Robert R. Baumgardt
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