

## DECISION DOCUMENT FOR MMRP SITES

EPD letter received w/ comments dated	August 27, 2012
EPD letter received w/ comments (missing referenced email) dated	March 21, 2012
Transmittal letter sent to GA EPD dated	February 15, 2012
Transmittal letter sent to GA EPD (Dog Kennel/10 <sup>th</sup> ENG) dated	January 17, 2012
Transmittal letter sent to GA EPD dated	October 4, 2011
EPD letter received approving extension dated	August 5, 2011
Transmittal letter sent to GA EPD requesting extension dated	July 26, 2011
EPD letter received w/ comments dated	April 8, 2011
Transmittal letter sent to GA EPD dated	January 21, 2011
EPD letter received approving RTC dated	September 13, 2010
Transmittal letter sent to GA EPD w/ RTC dated	August 3, 2010
EPD letter received w/ comments dated	June 16, 2010
Transmittal letter sent to GA EPD dated	March 16, 2010
EPD letter received approving CSR dated	March 3, 2008
Transmittal letter sent to GA EPD dated	December 17, 2007
Decision Document	no date
Transmittal letter sent to GA EPD dated (No EPD Response)	December 17, 2007
Transmittal letter sent to GA EPD dated (No EPD Response)	December 22, 2006



# 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: 404/656-2833 FAX: 404/651-9425

August 27, 2012

## **CERTIFIED MAIL** **RETURN RECEIPT REQUESTED**

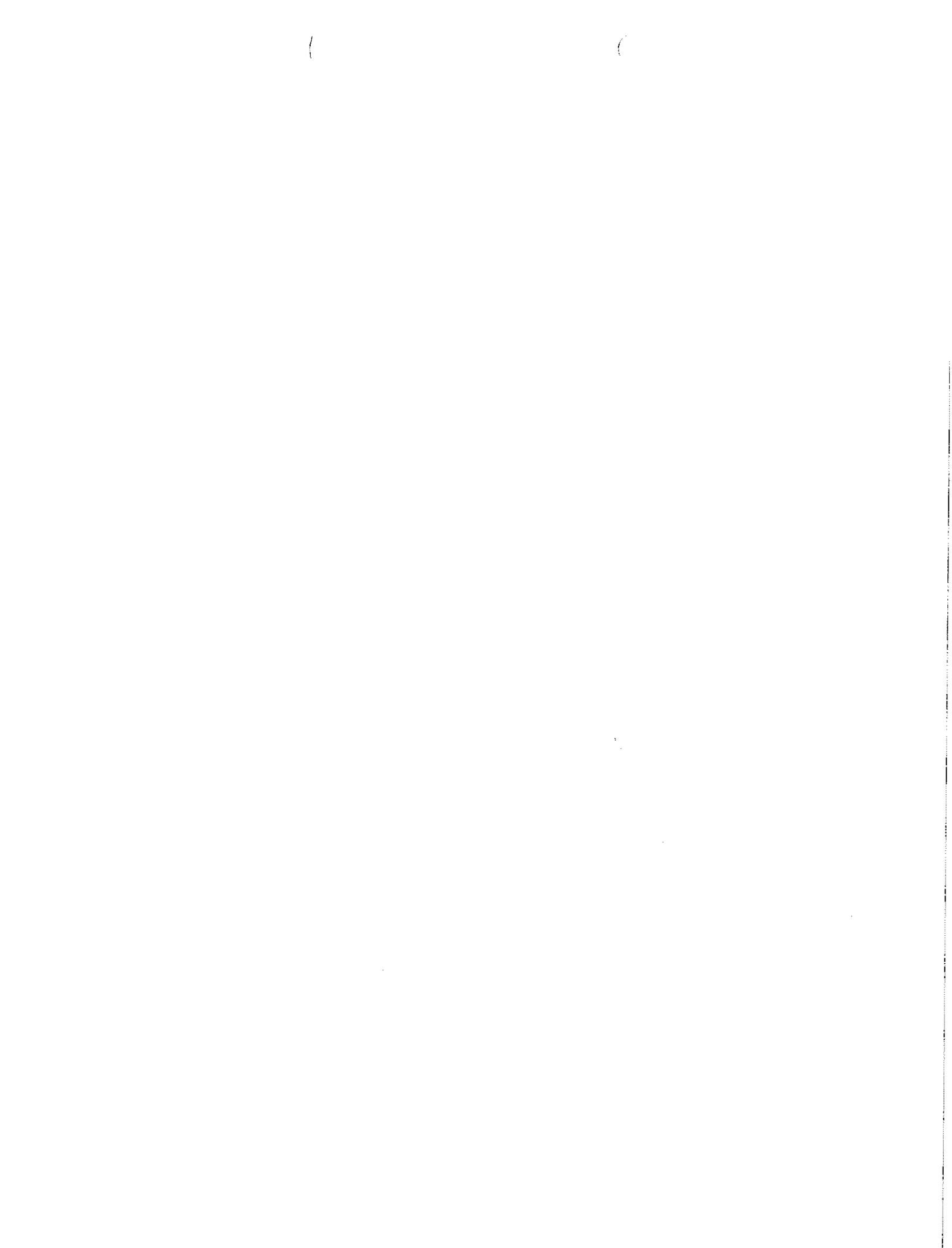
Mr. Robert R. Baumgardt  
Director, Public Works  
Headquarters, Third Infantry Division (Mechanized) and Fort Stewart  
Directorate of Public Works, Building 1137  
Environmental Division, Prevention, and Compliance Branch  
ATTN: Algeana Stevenson  
1587 Frank Cochran Drive  
Fort Stewart, Georgia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

RE: *Stakeholder Draft Final Military Munitions Response Program [MMRP] Land Use Controls, Interim Measures Work Plan for Anti-Aircraft Range 90 MM – 2 (FTSW-002-R-01), Small Arms Range – 2 (FTSW-006-R-01), Hero Road Trench Area (FTSW-008-R-01), Anti-Aircraft Range – 4-A (FTSW-009-R-01), Anti-Aircraft Range – 4-B (FTSW-009-R-02), Anti-Tank Range 90-MM – 2 (FTSW-010-R-01), and Grenade Launcher Range (FTSW-011-R-01) Site FTSW-006-R-01; Fort Stewart, Georgia; dated February 2012 and received February 21, 2012.*

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's *Draft Final Military Munitions Response Program Land Use Controls (LUCs) Interim Measures Work Plan* dated February 2012 and received February 21, 2012. Based on our review, EPD has generated the following comments:

1. **Sections 3.4.1 through 3.4.6.** These sections summarize the descriptions for each MRS. For each MRS, please include the following information in these sections:
  - **Historical construction:** All historical construction activities, such as the ammo supply point at Anti-Aircraft Range 90 mm – 2, should include the date(s) this construction took place, whether the construction areas were cleared of munitions prior to construction, and whether the construction took place while the MRS was officially closed or still operable.
  - **Recent construction:** All recent construction activities, such as the training complex within Anti-Aircraft Range – 4-A, should include the date(s) this construction took place, whether the construction areas were cleared of munitions prior to construction, and whether the construction took place while the MRS was officially closed or still operable.



- Ongoing and Planned future construction: All planned ongoing and future construction activities, such as the identified ongoing construction activities at Anti-Tank Range 90 mm - 2, should include the date(s) this construction will take place, whether the construction areas will be cleared of munitions prior to construction (and how), and whether construction will take place while the MRS is officially closed or still open.
  - Figures. For each MRS, please show the aerial extent of previous and ongoing military construction activities (including future expansion) on the appropriate figures. If any areas within each MRS are to be excluded from the LUCs, please identify these areas on the appropriate figures and discuss in the text.
2. **Section 3.4.4.3, Existing Engineering or Institutional Controls**. This section states, "According to the *Final Work Plan Land Use Controls at the 4<sup>th</sup> IBCT Complex, Fort Stewart, Georgia*, dated October 2011, fencing of about 11,300 feet will be installed along the perimeter of four separate wetland areas within the Anti-Aircraft Range – 4B." Please note that we have not received the aforementioned work plan. Additionally, please show the location of the planned 11,300 feet of fencing around the four separate wetland areas on Figure 3-6 or a separate figure.
  3. **Section 3.4.5.3, Existing Engineering or Institutional Controls, Page 3-8**. The single sentence of this section states, "The motor pool area within the MRS is fenced." Please expand this section to describe the fence (material, height, etc.) and clarify whether the purpose of the fence is to keep motor pool personnel from entering the MRS area (Anti-Tank Range 90mm - 2) or keep unauthorized personnel out of the motor pool. Please modify Figure 3-7 to show the location of the motor pool.
  4. **Section 3.6, Fort Stewart/MRS-Specific LUCs**. This section does not address the previous and ongoing military construction activities (including future planned construction) at several of the MRSs. Please discuss how LUCs are to be implemented for these areas, and whether clearance operations have been conducted prior to construction. For example, construction activities are currently ongoing at the Anti-Tank Range 90 mm – 2 MRS. This work plan should identify whether clearance operations are completed prior to this new construction, and how LUCs will be implemented for areas with historical construction as well as areas with new or planned construction.
  5. **Section 3.6, Fort Stewart/MRS-Specific LUCs**. This section identifies the use of existing fences as part of the LUCs, but does not specify the type of fence used. Please include a specification of the type of fence to include the height, style (picket, chain link, etc.) and material used (wood, galvanized aluminum, etc.). Additionally, please show the current locations of these fences on Figures 3-3 (Anti-Aircraft Range 90mm - 2), 3-5 (Hero Road Trench Area), and 3-6 (Anti-Aircraft Range - 4).
  6. **Figure 3-5, Hero Road Trench Area**. Section 3.4.3.2 states, "The southern portion of the Hero Road Trench Area is undeveloped property. A portion of the area is being used as a parking lot. The northern portion of the MRS is currently fenced off, and no use has been identified." In Figure 3-5, please identify the northern and southern portions, as well as the parking lot.

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Mr. Robert R. Baumgardt  
Fort Stewart  
August 27, 2012  
Page 3

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,

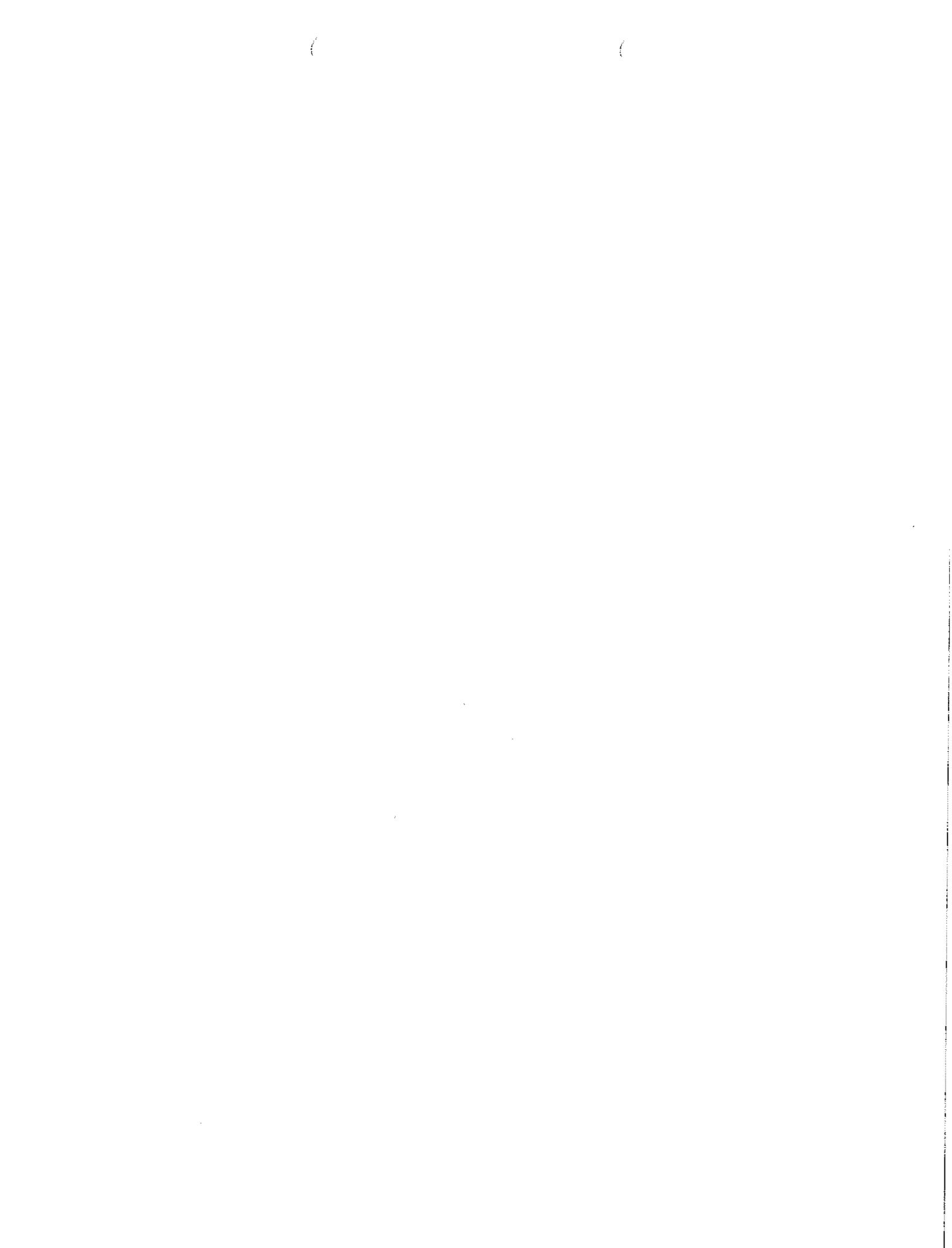


Amy Potter  
Unit Coordinator  
Hazardous Waste Management Program

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

File: Fort Stewart, Georgia (G)

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# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., SE, Suite 1154, Atlanta, Georgia 30334-9000

Mark Williams, Commissioner

Environmental Protection Division

Judson H. Turner, Director

Land Protection Branch

Mark Smith, Branch Chief

Phone: 404/656-7802 FAX: 404/651-9425

March 21, 2012

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

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: Fort Stewart's Responses to Comments on the *Final Phase 2 Confirmatory Sampling Report, Fort Stewart, Georgia (September 2011)*; received by e-mail on March 13, 2012; EPA ID No. GA9 210 020 872.

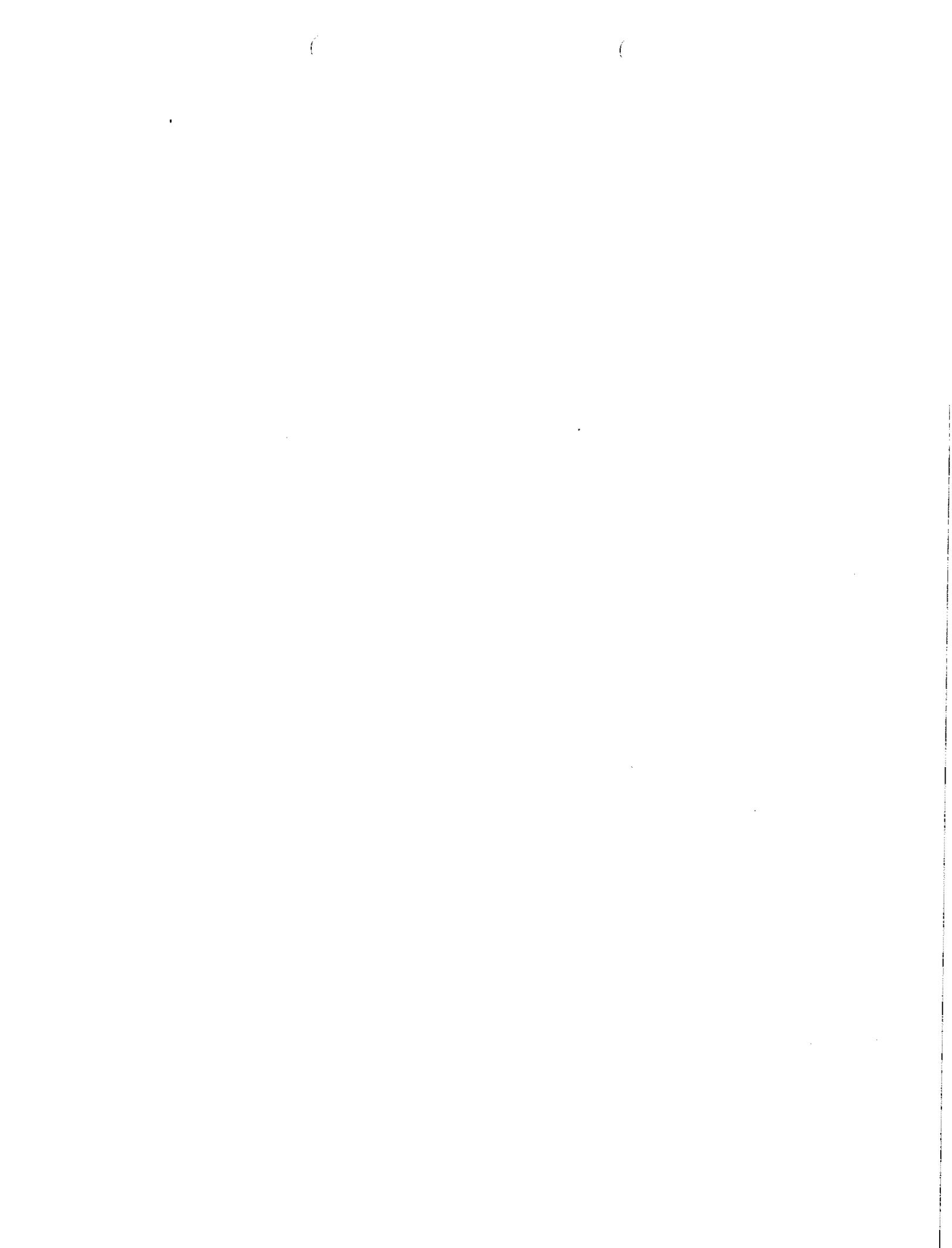
Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's (FTSW) Military Munitions Response Program (MMRP) responses to EPD's comments (RTC) on the *Final Phase 2 Confirmatory Sampling Report* received by e-mail on March 13, 2012. Based on our review, EPD has generated the following response:

**Original Comment #8:** Section 4.1.3.1, Fieldwork Results, MEC Results, Page 4-4, Second Paragraph. The report states, "However, according to FTSW Range Control, a number of EOD responses were reported on the MRA during the construction activities within the fenced area from 31 August 2009 until work was halted on 1 December 2010." According to the previous Stakeholder Draft Phase 2 Confirmation Sampling Report (December 2010), a total of 160 explosive ordnance disposal (EOD) responses were reported to FTSW Range Control from August 2009 through October 2010. The previous report also provides a list of munitions items found on Anti-Aircraft Range-4. This information appears to be missing in the current report. Please provide the either the specific or estimated number of EOD responses that have been reported on Anti-Aircraft Range-4. Please modify the remainder of Section 4.1 accordingly.

**Fort Stewart Response:** This revision from Stakeholder Draft to Final was discussed during the 24 August 2011 TPP Meeting. Meeting minutes documenting this discussion are provided in Appendix H. The following is a direct quote from the minutes: "There were over 150 items removed by Explosives Ordnance Disposal (EOD) within the construction footprint of this site between late 2009 and December 2010 (period of construction activities). The exact number of EOD responses / items found will not be reported in the Final Confirmatory Sampling (CS) Report due to inconsistent numbers between EOD and Range Control."

**EPD Response:** Fort Stewart's response does not preclude providing an *estimated* number of EOD responses as requested by EPD. Additionally, the response does not address why the list of munitions items in the previous report (December 2010) has been removed from the current final report. Please



Mr. Baumgardt  
Fort Stewart  
March 21, 2012  
Page 2

include the estimated number of EOD responses in Anti-Aircraft Range 4 from late 2009 and December 2010 as noted in Fort Stewart's above response. Additionally, please explain how the previous list of munitions found on Anti-Aircraft Range 4 was created and whether this list is credible. If the list is credible, please include this list in the final report.

**Original Comment #14:** Appendix F, MRSPP Table 9 (all MRSs). For each MRS, Table 9 (EHE Module: Ecological and/or Cultural Resources Data Element Table) does not identify ecological resources as being present. Appendix C of the MRSPP Primer (April 2007) defines ecological resources as "Threatened or endangered species (designated under the Endangered Species Act [ESA]) present on the MRS; or the MRS is designated under the ESA as critical habitat for a threatened or endangered species; or there are identified sensitive ecosystems such as wetlands or breeding grounds present on the MRS." Section 4.1.4.4.3 (Ecological Receptors) of the Confirmatory Sampling Report states, "FTSW is also a home to many state and federally threatened, endangered, and/or species of concern." Therefore, ecological resources appear to be present at each MRS, and Table 9 should be adjusted to reflect the presence of threatened and endangered species accordingly. Please revise.

**Fort Stewart Response:** It is the Army's position that only Threatened and Endangered Species (T&E) species known to exist on the MRS are recognized on Table 9. A thorough evaluation of T&E data was performed and the Grenade Launcher Range is the only MRS with a known Threatened and Endangered Species with their boundaries. Both the MRSPP and Section 4.3.4.4.5 and its MRSPP have been updated accordingly.

**EPD Response:** Fort Stewart's above response appears acceptable. However, upon review of Fort Stewart's *Final Environmental Impact Statement (EIS) for Training Range and Garrison Support Facilities Construction and Operation* (dated August 18, 2010), it appears that Anti-Aircraft Range 4 includes identified Red-Cockaded Woodpecker (RCW) trees (RCW is a state and Federal T&E). Additionally, cultural resources appear to be in Anti-Tank Range 90mm-2. Please clarify, and revise MRSPP Table 9 for Anti-Aircraft Range 4 and Anti-Tank Range 90mm-2 accordingly.

Within sixty (60) days after receipt of this letter, please submit two (2) copies of all revisions that address the above comments 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 and Remediation Program

c: Tressa Rutland, Fort Stewart (via facsimile)

File: Fort Stewart (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

February 15, 2012

CERTIFIED MAIL  
70102780000144281838

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 two (2) hard copies and one (1) electronic copy of the Stakeholder Draft Final Military Munitions Response Program Land Use Controls Interim Measures Work Plan, Fort Stewart, Georgia, dated February 2012 for your review.

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,

*Thomas C. Frey*  
for Robert R. Baumgardt  
Director, Public Works

Enclosures

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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

January 17, 2012

CERTIFIED MAIL  
70102780000144282224

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:

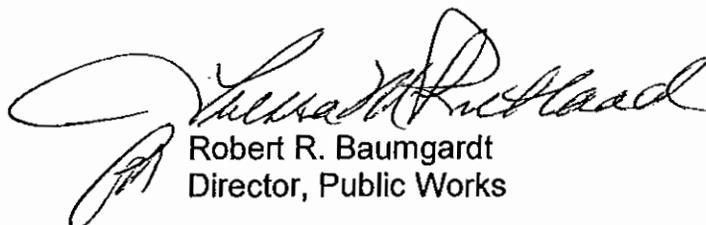
Fort Stewart is pleased to submit to the Georgia Environmental Protection Division two (2) hard copies and one (1) electronic copy of the Time Critical Removal Action Final Report Fort Stewart, Georgia, United States Army Corps of Engineers 10<sup>th</sup> Engineer Battalion Site & Dog Kennel Site, dated November 2011 for your review and approval.

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.

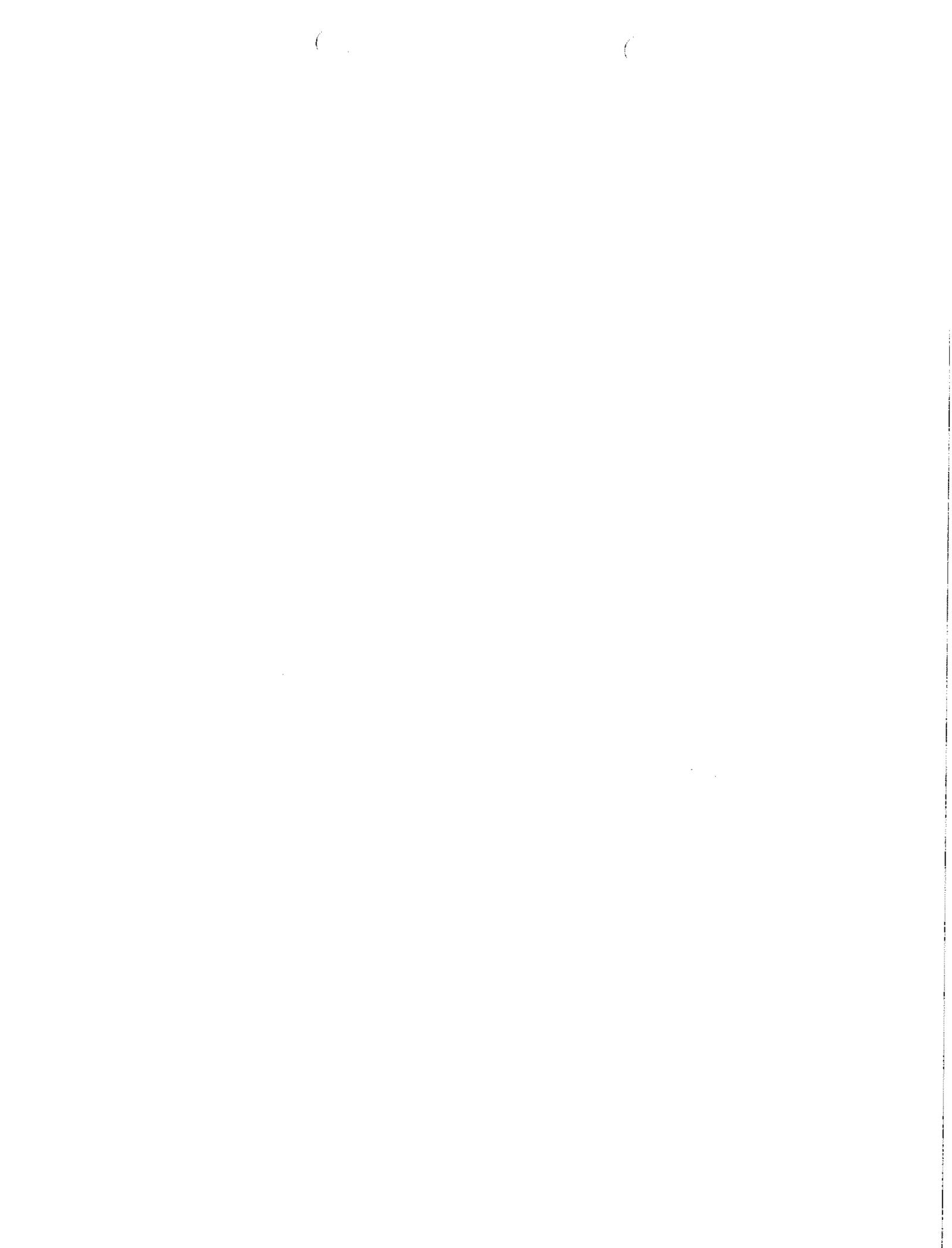
If you have any questions or comments regarding the enclosed report, please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works, Environmental Division, Prevention and Compliance Branch at (912) 767-2010.

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 FRANK COCHRAN DRIVE  
FORT STEWART, GEORGIA 31314-5048

REPLY TO  
ATTENTION OF

October 4, 2011

Office of the Directorate

CERTIFIED MAIL  
70102780000144281982

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 Phase 2 Confirmatory Sampling Report, Fort Stewart, Georgia dated September 2011.

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

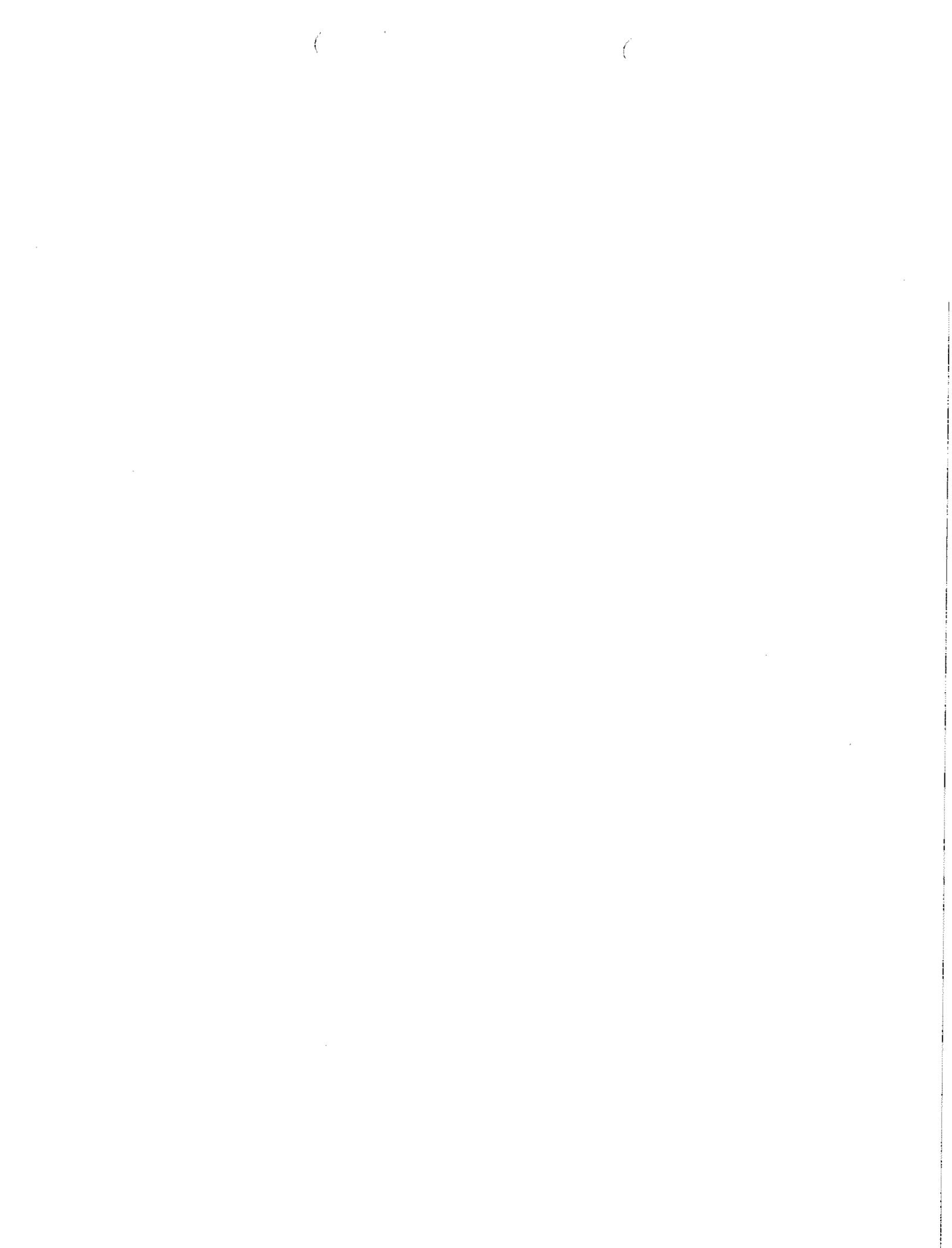
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gather 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 concerns, please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works, Prevention and Compliance Branch, at (912) 767-2010.

Sincerely,

Robert R. Baumgardt  
Director, Public Works

Enclosures



# 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  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief  
Phone: 404/656-7802 FAX: 404/651-9425

August 5, 2011



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: Letter Request for Extension (dated July 26, 2011) to respond to comments on the *Stakeholder Draft Phase 2 Confirmatory Sampling Report, Fort Stewart, Georgia* (December 2010).

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's request for an extension (received July 29, 2011) to address EPD's comment letter (dated April 8, 2011) regarding the *Stakeholder Draft Phase 2 Confirmatory Sampling Report* (dated December 2010 and received January 25, 2011). EPD hereby approves the extension until the requested date of September 19, 2011, to submit a response to EPD's April 8, 2011 comments. If you have any questions, please contact Mr. William Powell or Mr. Mo Ghazi at 404-656-2833.

Sincerely,



Amy Potter  
Unit Coordinator  
Hazardous Waste Management and Remediation 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

July 26, 2011

CERTIFIED MAIL

7010278000144281920

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

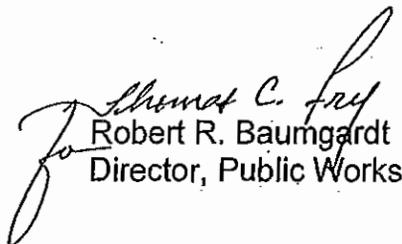
Dear Ms. Potter:

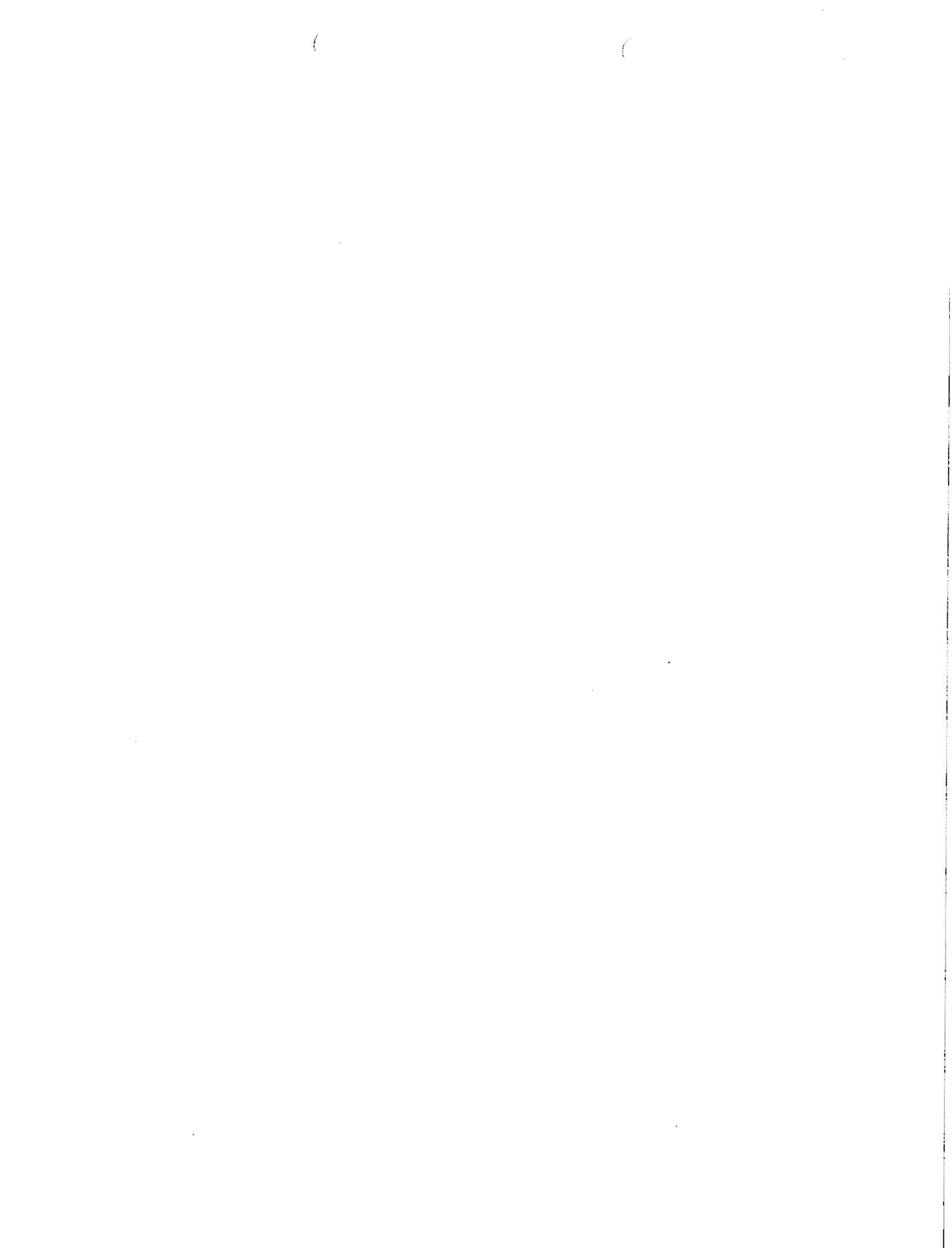
Fort Stewart is pleased to receive the Georgia Environmental Protection Division's (GA EPD) letter, dated April 8, 2011, regarding the Stakeholder Draft Phase 2 Confirmatory Sampling Report, Fort Stewart, Georgia, dated December 2010.

Fort Stewart would like to respectfully request an extension until September 19, 2011 to address GA EPD's comments regarding the above mentioned report.

If there are any questions or comments regarding this extension request, 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., SE, Suite 1154, Atlanta, Georgia 30334-9000

Mark Williams, Commissioner

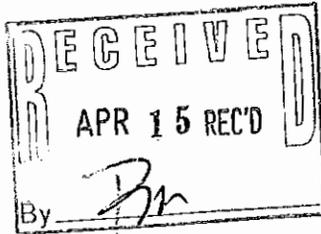
Environmental Protection Division

F. Allen Barnes, Director

Land Protection Branch

Mark Smith, Branch Chief

Phone: 404/656-7802 FAX: 404/651-9425



April 8, 2011

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

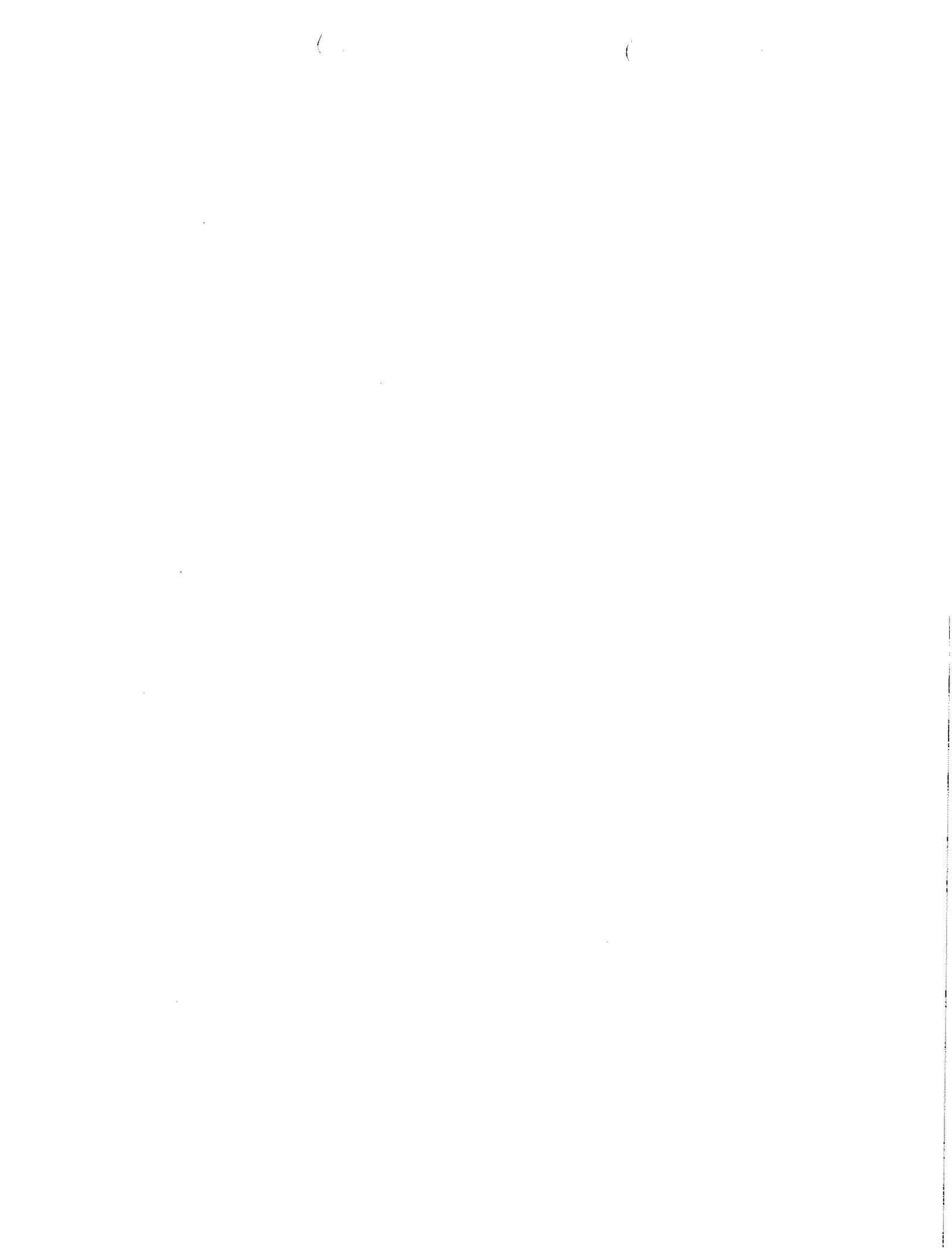
Mr. Robert R. Baumgardt  
Director, Public Works  
Headquarters, 3D Infantry Division (Mechanized) and Fort Stewart  
Directorate of Public Works, Building 1137  
Environmental Branch (ATTN: Algeana Stevenson)  
1550 Frank Cochran Drive  
Fort Stewart, GA 31314-4927

RE: *Stakeholder Draft Phase 2 Confirmatory Sampling Report, Fort Stewart, Georgia*; dated December 2010 and received January 25, 2011; EPA ID No. GA9 210 020 872.

Dear Mr. Baumgardt:

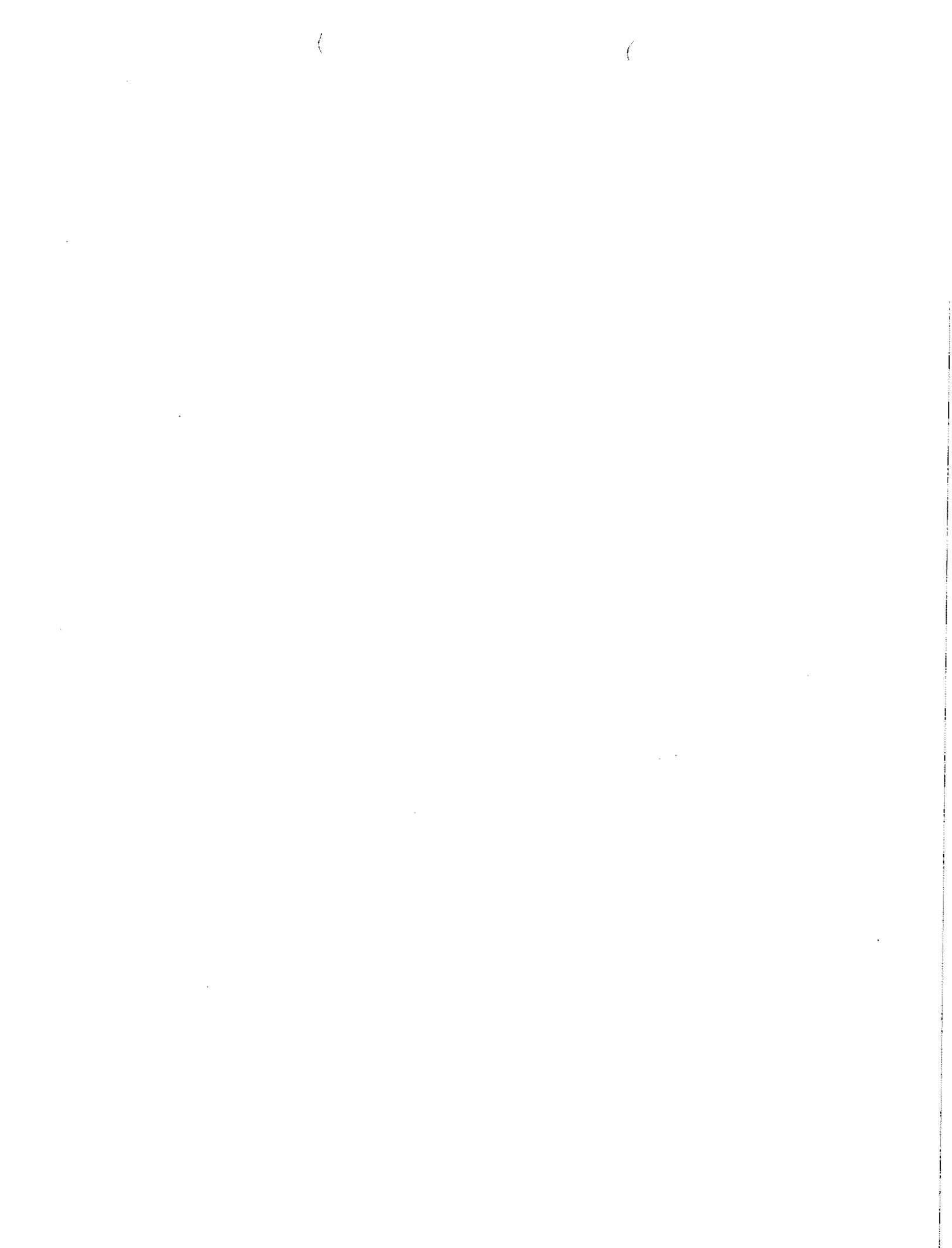
The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has reviewed Fort Stewart's Military Munitions Response Program (MMRP) *Stakeholder Draft Phase 2 Confirmatory Sampling Report* dated December 2010, and received January 25, 2011. Based on our review, EPD has generated the following comments:

1. **Section 4.1.1 Site Description and Historical Overview.** This section states, "During ongoing construction activities beginning in August 2009, 160 EOD [Explosive Ordnance Division] response have been reported." However, this section does not describe the ongoing construction activities, or how the discovery of 160 EOD responses came about. Please include a summary of the on-going construction activities within the Anti-Aircraft Range-4 MRS, as well as the historical discovery of the 160 EOD responses, since it is an integral part of the site description and historical overview. Please provide the approximate footprint of the new buildings on Map 5-1.
2. **Section 4.1.4.1.2 Structures.** This section states, "There are currently 17 buildings on the MRS." No additional information is contained within this section. Please add a summary description of the 17 buildings within the Anti-Aircraft Range-4 MRS.
3. **Section 4.1.4.5.1 MEC [munitions and explosives of concern].** This section states, "As illustrated in the Exposure Pathway Analysis for MEC (Figure 4-1), the pathways for all human and ecological receptors are *potentially* complete for all receptors to encounter MEC on the surface in undeveloped areas." Because there have been 160 EOD responses/MEC



discoveries due to recent construction activities, the MEC has been physically moved by these construction activities, and these construction activities are on going in undeveloped areas, the pathway is indeed complete, and no longer potentially complete, for the construction worker in both the surface and subsurface pathways. Please modify this section accordingly.

4. **Section 4.3.4.1.2 Structures.** This section states, "There are currently 28 buildings on the MRS." No additional information is contained within this section. Please add a summary description of the 28 buildings within the Grenade Launcher Range MRS.
5. **Section 5.1 Recommendations Review.** EPD concurs with Fort Stewart's recommendations that all four Munitions Response Sites (MRS) should proceed to developing Resource Conservation and Recovery Act (RCRA) Facility Investigation/Conceptual Site Model (RFI/CMS) Work Plans, which include the Anti-Aircraft Range-4, Anti-Tank Range 90-MM – 2, Grenade Launcher Range, and Small Arms Range – 2.
6. **Appendix F: MRSPP, Section F-1 Anti-Aircraft Range-4, Table 1.** Table 1 classifies the munitions known to exist in Anti-Aircraft Range-4. Table 1 currently classifies these munitions as High Explosive (used or damaged), and not considered to be Sensitive. However, over 160 EOD responses have been documented in this Range, and several of the munitions were identified as high explosive. Many of the EOD responses were required to be blown in-place. Please revise Table 1 to classify the munitions type as Sensitive due to the limited information provided by Range Control and the presence of high explosives that are required to be blown in-place.
7. **Appendix F: MRSPP, Section F-1 Anti-Aircraft Range-4, Table 2.** Table 2 classifies the source of explosive hazards at Anti-Aircraft Range-4. Table 2 currently classifies these munitions as a Former Firing Point. However, over 160 EOD responses have been documented in this MRS, indicating that parts of this MRS likely contained impact or target areas and associated buffer and safety zones. Therefore, please revise Table 2 to classify the explosive hazard as Former Range.
8. **Appendix F: MRSPP, Section F-2 Anti-Tank Range 90-MM – 2, Table 2.** Table 2 classifies the source of explosive hazards at Anti-Tank Range 90-MM – 2. Table 2 currently classifies these munitions as a Former Firing Point. However, Section 4.2.1 clearly states that this MRS includes the downrange area of six separate ranges, including a grenade launcher range and a 120-mm anti-aircraft range. Therefore, please revise Table 2 to classify the explosive hazard as Former Range.
9. **Appendix F: MRSPP, Section F-2 Anti-Tank Range 90-MM – 2, Table 29.** Table 29 calculates the final MRS Priority. For the EHE Rating, "E" is circled. However, Table 10 calculates the EHE Rating as "D." Please correct this discrepancy.



Mr. Baumgardt  
Fort Stewart  
April 8, 2011  
Page 3

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 and Remediation Program  
Land Protection Branch

c: Tressa Rutland, Fort Stewart (via facsimile)

File: Fort Stewart (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

January 21, 2011

Office of the Directorate

CERTIFIED MAIL

7010 0780 0002 2537 2864

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:

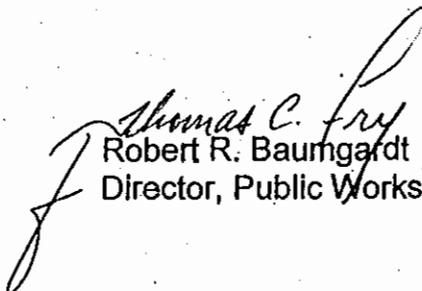
Fort Stewart is pleased to submit two (2) hard copies and one (1) electronic copy of the Stakeholder Draft Phase 2 Confirmatory Sampling Report, Fort Stewart, Liberty County, Georgia dated December 2010 for your review and comments.

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.

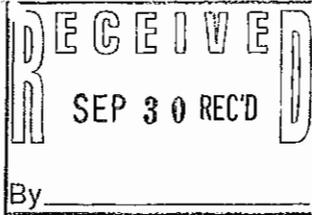
Please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works, Prevention and Compliance Branch, at (912) 767-2010, should questions arise regarding the enclosed report.

Sincerely,

  
Robert R. Baumgardt  
Director, Public Works

Enclosures





# Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, S.E., Suite 1154, Atlanta, Georgia 30334-9000  
Chris Clark, Commissioner  
Environmental Protection Division  
F. Allen Barnes, Director  
Land Protection Branch  
Mark Smith, Branch Chief  
Phone: 404/656-7802 FAX: 404/651-9425

September 13, 2010

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Robert R. Baumgardt  
Acting 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: *Stakeholder Final Phase 2 Historical Records Review, Fort Stewart, Georgia, dated June 2010, and received August 6, 2010; 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 Stakeholder Final Phase 2 Historical Records Review, Fort Stewart, Georgia, dated June 2010, and received August 6, 2010. From the review, the document and all revisions made in response to EPD's comment letter (Potter to Baumgardt dated June 16, 2010) regarding the *Stakeholder Draft Phase 2 Historical Records Review dated February 2010, Fort Stewart, Georgia*, appear to be acceptable.

Should you have any questions concerning this correspondence, please contact Mr. Mo Ghazi or Mr. William Powell of my staff at (404) 656-2833.

Sincerely,

A handwritten signature in black ink that reads "Amy Potter". The signature is fluid and cursive.

Amy Potter  
Unit Coordinator

Hazardous Waste Management and Remediation Program

cc: Tressa Rutland, Fort Stewart (via facsimile)

File: Fort Stewart (G)

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DEPARTMENT OF THE ARM  
US ARMY INSTALLATION MANAGEMENT COMMAND  
HEADQUARTERS, US ARMY GARRISON, FORT STEWART / HUNTER ARMY AIRFIELD  
1587 FRANK COCHRAN DRIVE  
FORT STEWART, GEORGIA 31314

REPLY TO  
ATTENTION OF

Office of the Directorate

AUG 3 2010

CERTIFIED MAIL

7008 3230 000070276856

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. Amy Potter:

Fort Stewart is pleased to submit two hard copies and a compact disc of the Stakeholder Final Phase 2 Historical Records Review for Fort Stewart, Fort Stewart, Georgia dated June 2010 for your review and comments.

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.

Please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works Prevention and Compliance Division, at (912) 767-2010, should questions arise regarding the enclosed report.

Sincerely,

Robert R. Baumgardt  
Director, Public Works

Enclosures



# Georgia Department of Natural Resources

2 Martin Luther King, Jr. Dr., SE, S 1154, Atlanta, Georgia 30334-9000

Chris Clark, Commissioner

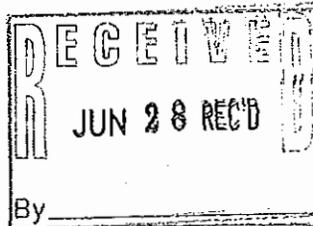
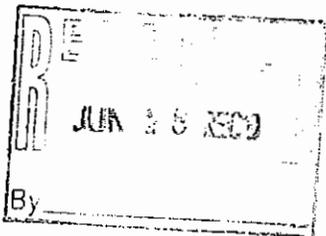
Environmental Protection Division

F. Allen Barnes, Director

Land Protection Branch

Mark Smith, Branch Chief

Phone: 404/656-7802 FAX: 404/651-9425



June 16, 2010

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Robert R. Baumgardt  
Acting 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: Stakeholder Draft Phase 2 Historical Records Review, Fort Stewart, Georgia; dated February 2010, and submitted March 19, 2010; EPA ID No. GA9 210 020 872.

Dear Mr. Baumgardt:

The Land Protection Branch of the Georgia Environmental Protection Division (EPD) has completed their review of Fort Stewart's Stakeholder Draft Phase 2 Historical Records Review, Fort Stewart, Georgia, dated February 2010, and submitted March 19, 2010. EPD has the following comments:

1. **Missing Maps on the CD.** The following Maps are missing on the CD: 2-1, 2-2, 4-1 through 4-5, and 6-1. Please provide a new CD that contains all the missing maps.
2. **Sections 4.1.2 (Anti Aircraft Range - 4), Page 4-10, and 4.4.2 (Small Arms Range - 2), Page 4-42.** In the last paragraph of the above two sections the report states, "However, as mentioned previously, the sources of the munitions encountered during the EOD [Explosive Ordnance Disposal] responses are unknown and represent a data gap." Please provide a discussion on the implications that the data gaps (unexpected munitions) may have on determining the conceptual site model (CSM) and implementing the investigation.
3. **Section 5.2.1.5.4, Munitions Debris, Page 5-10.** This section states, "Two EOD responses have been reported at the site, a M67 grenade and an Unexploded Ordnance (UXO) response (no information). Adjacent to the site, they have encountered 20-mm, 25-mm, 81-mm, and a 3.25-inch rocket in the operational area though, which is not MMRP eligible." Please include on Map 4-2 the locations of the adjacent EOD response areas. Due to these EOD responses, this area should warrant further investigation. Please expand the Anti-Aircraft Range - 4 to include this area adjacent to the site.
4. **Section 5.2.4.5.5, Associated Munitions Constituents, Page 5-37.** This section states, "Soil samples were collected within the boundary of Small Arms Range - 2 and have been analyzed for metals as part of a time critical investigation." It is not specified whether the soil sample data is from surface soil (0-1 foot in depth) or subsurface soil (> 1 foot in depth). Please indicate the origin of the sample and if the soil is from both surface and subsurface. Please segregate the soil data into these two separate media (surface and subsurface soil), and revise this section accordingly.

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Fort Stewart

June 16, 2010

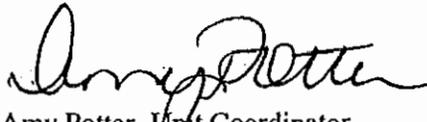
Page 2

5. **Section 5.2.4.5.5, Associated Munitions Constituents, Page 5-37.** Appendix B on the enclosed CD contains the lab analysis results for soil samples taken at the Small Arms Range - 2. Please include, in Section 5.2.4.5.5, a summary table for the results of the soil sample analyses located in Appendix B.
6. **Section 5.2.4.6.2, Munitions Constituents, Page 5-39.** This section states, "During this investigation soil samples were collected from the Fire Station 5 Berm. In total 22 samples were collected and analyzed for Antimony, Copper and Lead. Three samples exceeded the 400 mg/kg USEPA Region 9 PRG for Lead." Please note that EPD no longer uses the EPA Region 9 Preliminary Remediation Goals (PRGs) for screening purposes. EPD now uses the new EPA Regional Screening Levels (RSLs) [with all non-carcinogenic constituents adjusted by a factor of 0.1 to meet the Hazard Quotient (HQ) criteria]. Please revise accordingly.
7. **Figure 5-8.** This page is numbered Page 6-42. The correct page number should be 5-42. Please revise.
8. **Section 7. Conclusion.** The numerical designation of Seven (7) for this section and all the subsections (e.g., 7.1, 7.2) should be changed to Six (6) in order to correspond with the Table of Contents (TOC). Please revise this section and the TOC as necessary.
9. **Section 7.2, Data Gaps.** Please include a bullet covering data gaps with regards to soil sampling and the absence of analytical data (both metals and munitions constituents).
10. **Future Soil Sampling.** Please note that EPD requires discrete soil sampling for purposes of delineation and assessment of risk. Composite samples (such as from the Cold Regions Research and Engineering Laboratory method) will not be accepted for these purposes.

Within sixty (60) days of receipt of this letter, please submit two (2) copies of all revisions that address the above comments to the report, 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 concerning this correspondence, please contact Mr. Mo Ghazi or Mr. William Powell of my staff at (404) 657-8674 or (404)-657-8680.

Sincerely,

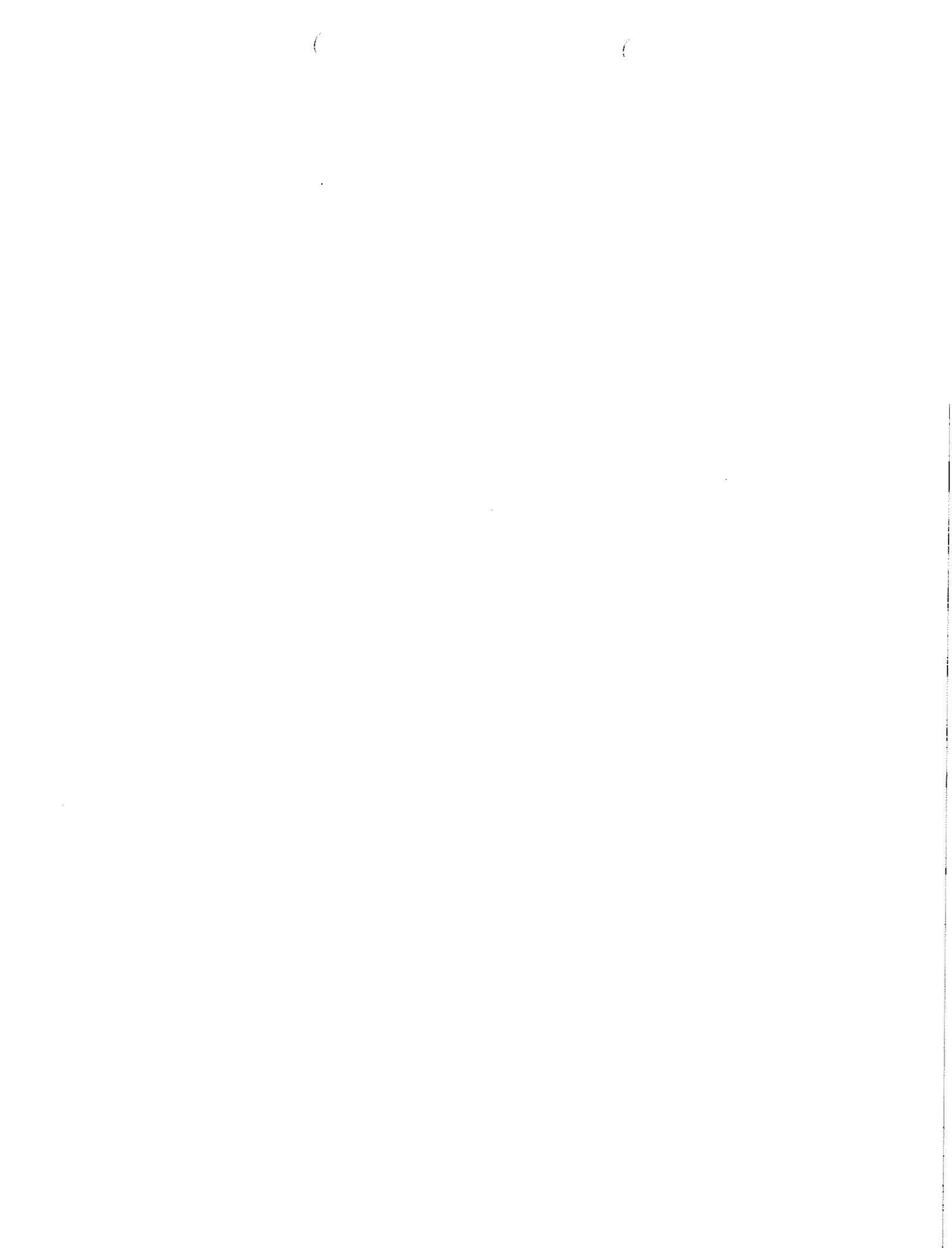


Amy Potter, Unit Coordinator  
Hazardous Waste Management and Remediation Program  
Land Protection Branch

c: Tressa Rutland, Fort Stewart (via facsimile)

File: Fort Stewart (G)

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

REPLY TO  
ATTENTION OF

WAR 16 2010

Office of the Directorate

CERTIFIED MAIL

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. Amy Potter:

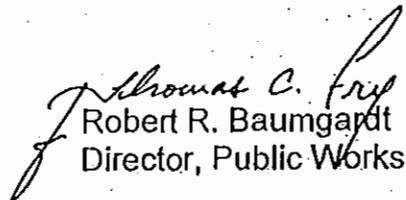
Fort Stewart is pleased to submit two hard copies and a compact disc of the Stakeholder Draft Phase 2 Historical Records Review for Fort Stewart, Fort Stewart, Georgia dated February 2010 for your review and comments.

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.

Please contact Ms. Algeana Stevenson at (912) 315-5144 or Ms. Tressa Rutland, Directorate of Public Works Environmental, Prevention and Compliance Division, at (912) 767-2010, should questions arise regarding the enclosed report.

Sincerely,

  
Robert R. Baumgardt  
Director, Public Works

Enclosures



# Georgia Department of Natural Resources

2 Martin Luther King Jr. Drive, N.E., Suite 1470, Atlanta, Georgia 30334

Noel Holcomb, Commissioner

Environmental Protection Division

Carol A. Couch, Ph.D., Director

404-656-2833

March 3, 2008

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Michael W. Biering, P.E.  
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: Approval Final Confirmatory Sampling Report for Military Munitions Response Program (MMRP) Sites, December 2007 - Fort Stewart, GA; EPA ID No. GA9 210 020 872.

Dear Mr. Biering:

The Hazardous Waste Management Branch of the Georgia Environmental Protection Division (GA EPD) is in receipt of the above-referenced document submitted with correspondence (Biering to Ghazi) dated December 17, 2007. Based on our review, GA EPD has determined that Fort Stewart has sufficiently responded to our comments contained in GA EPD correspondence (Potter to Biering) dated September 27, 2007; and approves the Final Confirmatory Sampling Plan for Military Munitions Response Program (MMRP) Sites - Fort Stewart, GA, dated December 17, 2007.

Should you have any questions concerning this correspondence, please contact Mo Ghazi of my staff at 404-463-7507.

Sincerely,



Amy Potter

Unit Coordinator

Hazardous Waste Management Branch

c: Darrell Crosby, Manager, GA EPD-Coastal District  
Tressa Rutland, Fort Stewart (via facsimile)

File: Fort Stewart (G)

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REPLY TO  
ATTENTION OF

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

6320

DEC 17 2007

Office of the Directorate

CERTIFIED MAIL

Georgia Environmental Protection Division  
Attention: Mr. Mahamad Ghazi, PhD  
2 Martin Luther King Jr. Drive, Southeast  
Floyd Towers East, Suite 1452  
Atlanta, Georgia 30334

Dear Mr. Ghazi:

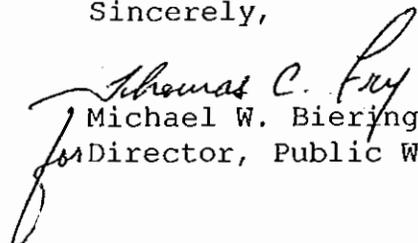
Fort Stewart is pleased to submit two hard copies and a compact disc of the Resource Conservation Recovery Act Final Confirmatory Sampling Report for the Military Munitions Response Program, Fort Stewart, Georgia dated November 2007 for your review.

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

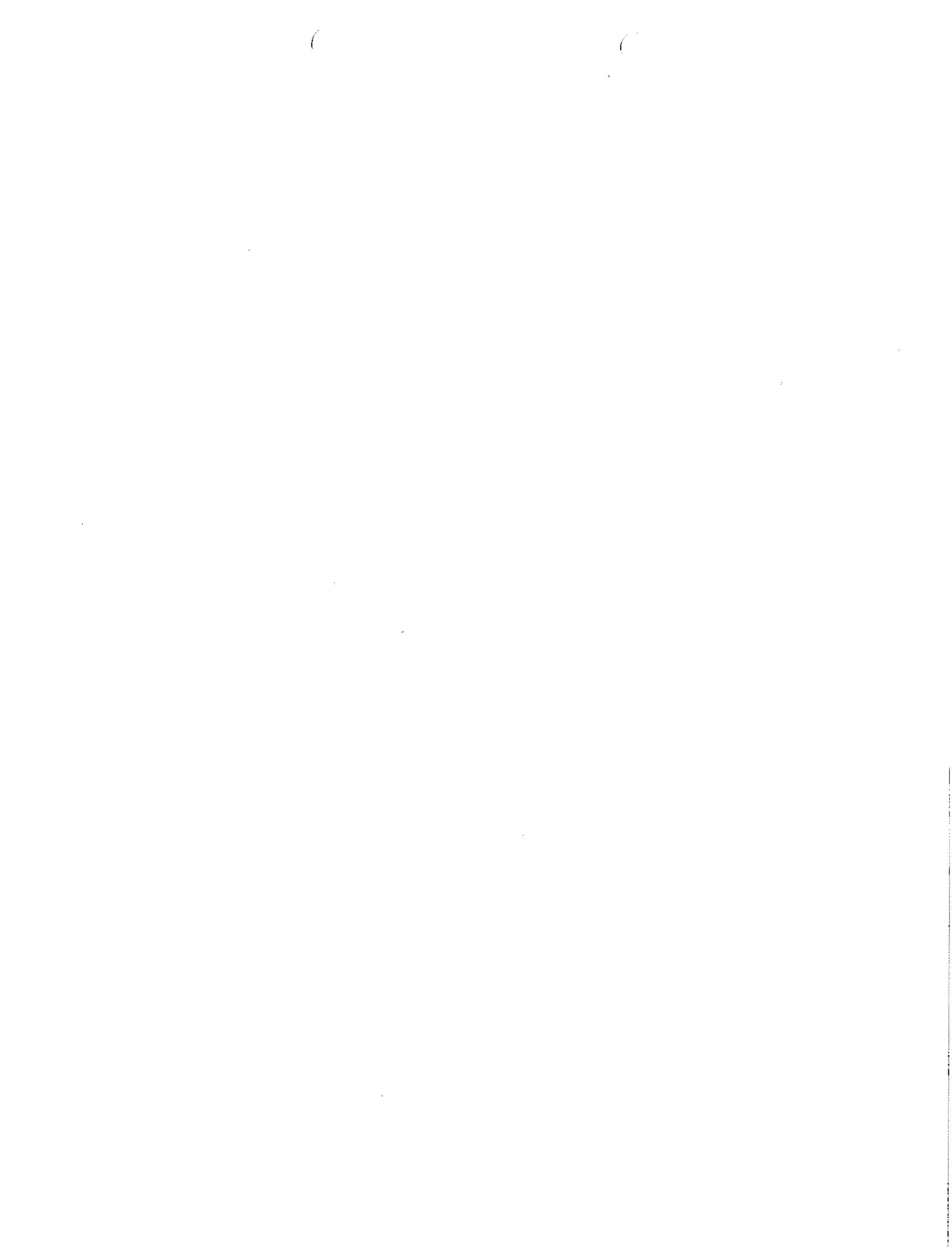
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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 there are any questions or comments regarding the enclosed report, please contact Ms. Algeana Stevenson at (912)315-4226 or Ms. Tressa Rutland, Directorate of Public Works, Prevention and Compliance Branch at (912)767-2010.

Sincerely,

  
Michael W. Biering, P. E., CFM  
for Director, Public Works

Enclosure





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

REPLY TO  
ATTENTION OF

Directorate of Public Works

CERTIFIED MAIL

Georgia Environmental Protection Division  
Hazardous Waste Management Branch  
Attention: Mr. Ghazi  
Floyd Towers East, Suite 1154  
2 Martin Luther King, Jr. Drive S.E.  
Atlanta, GA 30334

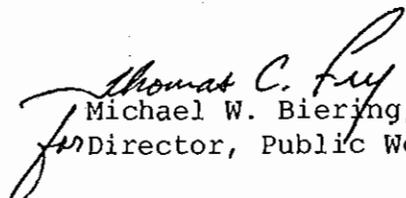
Dear Mr. Ghazi:

As a lead agency and in accordance with the 32 Code of Federal Regulations 179.5 requirements, *Fort Stewart* is providing this notification that a Military Munitions Response Program (MMRP) Confirmatory Sampling (CS) event, which is intended to meet the requirements of a MMRP Site Inspection (SI) under CERCLA was completed in *May 2007*. MMRP sites (Anti-Aircraft Range -1; Anti-Aircraft Range 90mm-2; Anti-Tank Range 90mm; Hand Grenade Course; Small Arms Range-1; Small Arms Range-3; and Hero Road Trench Site) established during the SI process were initially evaluated and scored by applying the Munitions Response Site Prioritization Protocol (MRSPP). The MRSPP evaluation criteria included assessing types of munitions which may be potentially present, assessing land uses, determining ease of access to sites, and quantifying the number of people with access to sites.

The draft MMRP scores were provided for your review in the Draft CS Report. You may elect to simply review and provide input on the initial scores within the Draft CS Report. MMRP scores will be considered final in the Final CS Report. In accordance with the 32 CFR Part 179 requirements and prior to finalizing these scores, we are soliciting stakeholder interest in participation in the scoring process. If you, or any applicable stakeholder, are interested in participating in the scoring process, a meeting can be setup. If no such requests are received within 30-days of this letter, then the MRSPP scores, as presented in the Final CS Report, will be considered final.

Should you have any questions regarding the CS and the application of MRSPP, please contact Ms. Algeana Stevenson at (912) 315-4226 or Ms. Tressa Rutland, Directorate of Public Works, Environmental Branch, at (912) 767-2010.

Sincerely,

  
Michael W. Biering, P.E., CFM  
for Director, Public Works

Enclosures





REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
ARMY INSTALLATION MANAGEMENT CO.  
US ARMY GARRISON, FORT STEWART / HUNTER ARMY AIRFIELD  
DIRECTORATE OF PUBLIC WORKS  
1587 FRANK COCHRAN DRIVE  
FORT STEWART, GEORGIA 31314

632

DEC 17 2007

Office of the Directorate

CERTIFIED MAIL

Georgia Environmental Protection Division  
Attention: Mr. Mahamad Ghazi, PhD  
2 Martin Luther King Jr. Drive, Southeast  
Floyd Towers East, Suite 1452  
Atlanta, Georgia 30334

Dear Mr. Ghazi:

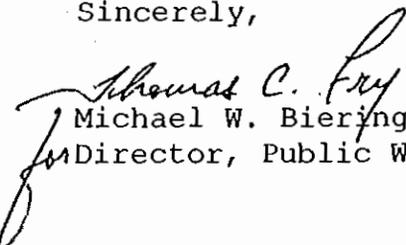
Fort Stewart is pleased to submit two hard copies and a compact disc of the Resource Conservation Recovery Act Final Confirmatory Sampling Report for the Military Munitions Response Program, Fort Stewart, Georgia dated November 2007 for your review.

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 there are any questions or comments regarding the enclosed report, please contact Ms. Algeana Stevenson at (912)315-4226 or Ms. Tressa Rutland, Directorate of Public Works, Prevention and Compliance Branch at (912)767-2010.

Sincerely,

  
Michael W. Biering, P. E., CFM  
Director, Public Works

Enclosure





DEPARTMENT OF THE ARMY  
QUARTERS, 3D INFANTRY DIVISION AND 1  
42 WAYNE PLACE, SUITE 200  
FORT STEWART, GEORGIA 31314-5000

VART

DEC 22 2006

REPLY TO  
ATTENTION OF

Office of the Directorate

EXPRESS MAIL

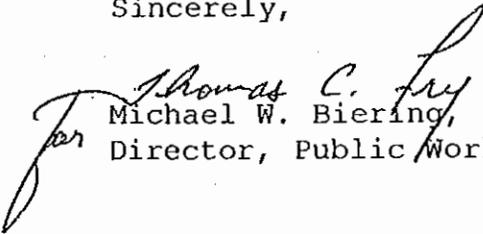
Georgia Environmental Protection Division  
Attention: Mr. Benoit Causse  
2 Martin Luther King Jr. Drive, Southeast  
Floyd Towers East, Suite 1470  
Atlanta, Georgia 30334

Dear Mr. Causse:

Fort Stewart is pleased to submit one hard copy and a compact disc of the Final Historical Records Review for Fort Stewart, Fort Stewart, Georgia dated September 2006 for your review and comments.

If there are any questions or comments regarding the enclosed report, please contact Ms. Algeana Stevenson at (912)315-4226 or Ms. Tressa Rutland, Directorate of Public Works, Prevention and Compliance Branch at (912)767-2010.

Sincerely,

  
Michael W. Biering, P. E.  
Director, Public Works

Enclosure

1 - final copy -

