Georgia Department of Natural Resources
205 Butler Street, S.E., Suite 1162, Atlanta, Georgia 30334
Lonice C. Barrett, Commissioner
Environmental Protection Division
Harold F. Reheis, Director
404/656-2833

December 8, 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gregory V. Stanley, Colonel, U.S. Army
Director, Public Works
Headquarters, 3D Infantry Division (Mechanized) and Fort Stewart
Directorate of Public Works, Building 1137
Environmental Branch (ATTN: Melanie Little)
1550 Frank Cochran Drive
Fort Stewart, GA 31314-4927

RE: Phase II RCRA Facility Investigation (RFI) Report for Sixteen (16) Solid Waste Management Units (SWMUs) dated April 2000; Fort Stewart; EPA ID No. GA9 210 020 872.

Dear Colonel Stanley:

The Hazardous Waste Management Branch of the Georgia Environmental Protection Division (GA EPD) has reviewed the above-referenced document and determined the following.

1. In correspondence (Khaleghi to Perez) dated July 14, 1999, GA EPD forwarded two hundred and seven (207) comments to Fort Stewart documenting our review of the February 1999 version of the Phase II RFI Report for 16 SWMUs. Upon receipt of that letter, your facility responded to each of those comments and created a set of Minutes from our September 14, 1999 Comment Resolution Meeting attended by representatives from Fort Stewart, Science Applications International Corporation and GA EPD [See correspondences (Perez to Khaleghi) dated August 20, 1999 and (Perez to Rabon) dated September 27, 1999, respectively]. Based upon our review of your letters, GA EPD formally approved the Fort Stewart Response to Comments (as clarified and/or modified by the September 14, 1999 Meeting Minutes) in correspondence (Khaleghi to Perez) dated October 4, 1999.

   Fort Stewart has further provided an amended Response to Comments in Appendix L (Volume III) of the Phase II RFI Report for 16 SWMUs dated April 2000 with correct page numbers and citations in order to ease GA EPD's review process. In addition, a notation is provided in the table if a specific comment, or a portion of a comment, is no longer applicable. We appreciate the detail and proactive manner with which Fort Stewart has responded to our comments; the responses are approved with the exception of those for the six (6) SWMUs addressed by Comment Nos. 7-9 below.

2. GA EPD maintains that the corrective action projects required by the Conditions of the Fort Stewart Hazardous Waste Facility Permit #HW-045(S&T) (Permit) have been exceptionally well-managed and well-executed by Ms. Melanie Little of your staff and by Science Applications International Corporation. It is also our opinion that this Phase II RFI Report for 16 SWMUs dated April 2000 is of

superior quality. As GA EPD has stated before, our agency is utilizing a number of the RFI Reports and Corrective Action Plans (CAPs) created by Fort Stewart as examples for other facilities which are regulated by the Georgia Hazardous Waste Management Act, as amended, O.C.G.A. §12-8-60, et seq.; and Rules for Hazardous Waste Management, Chapter 391-3-11, promulgated pursuant thereto, as amended, which incorporates by reference the Code of Federal Regulations found in 40 CFR Parts 124, 260-268, 270, 273 and 279. We continue to appreciate the high degree of professionalism and technical expertise that Fort Stewart brings to these projects.

3. The Phase II RFI Report for 16 SWMUs dated April 2000 is complete, as qualified by Comment Nos. 7-9 below.

4. Corrective action is required at the SWMUs listed below pursuant to 40 CFR §264.101(a), as referenced by the Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-11 Section .10. In accordance with Conditions IV.E.1 and IV.E.2 in your Permit, Fort Stewart must submit CAPs for the following SWMUs to GA EPD within ninety (90) days from receipt of this correspondence.

    a. Camp Oliver Landfill (SWMU 2)
    b. TAC-X Landfill (SWMU 3)
    c. Inactive EOD Area located approximately Nine (9) Miles Northeast of the Garrison Area (SWMU 8)
    d. Inactive EOD Area in Red Cloud Range, Hotel Area (SWMU 9)
    e. Inactive EOD Area North of Garrison Area (SWMU 10)
    f. Inactive EOD Area located approximately Three (3) Miles Northeast of Garrison Area (SWMU 11)
    g. Active EOD containing Open Detonation Unit and Open Burn Unit (SWMU 12A), Open Detonation Unit (SWMU 12B) and Open Burn Unit (SWMU 12C)

5. Corrective action is required at the SWMUs listed below pursuant to 40 CFR §264.101(a), as referenced by the Rules of Georgia Department of Natural Resources Environmental Protection Division Chapter 391-3-11 Section .10. In accordance with Conditions IV.E.1 and IV.E.2 in your Permit, Fort Stewart must submit CAPs for the following SWMUs to GA EPD within one hundred and eighty (180) days from receipt of this correspondence.

    a. Industrial Wastewater Treatment Plant (SWMU 18)
    b. Evans Army Heliport POL Storage Facility (SWMU 29)

6. GA EPD tentatively concurs with the Fort Stewart recommendations that No Further Action (NFA) is required at the following SWMUs.

    a. Old Fire Training Area (SWMU 14)
    b. DRMO Hazardous Waste Storage Area (SWMU 17)
    c. Old Sludge Drying Beds (SWMU 19)
    d. 3rd Squadron 7th Cavalry Motor Pool and four (4) associated Oil/Water Separators (SWMU 27A)

e. 1st BN, 3d ADA Motor Pool and associated Oil/Water Separator (SWMU 27B)
f. 92d ECB (H) Motor Pool and associated Oil/Water Separator (SWMU 27C)
g. 26th SPT BN Motor Pool and associated Oil/Water Separator (SWMU 27D)
h. 703d SPT BN (Main) Motor Pool and associated two (2) Oil/Water Separators (SWMU 27E)
i. DISCOM Motor Pool and associated Oil/Water Separator (SWMU 27G)
j. NGTC Block 9900, 10300 Motor Pool and associated two (2) Oil/Water Separators (SWMU 27I)
k. 3rd BN, 69th Armor Motor Pool Wash Rack and Oil/Water Separator (SWMU 27K)
l. NGTC Block 10100 Motor Pool Wash Rack and Oil/Water Separator (SWMU 27M)
m. NGTC Block 9800 Motor Pool Wash Rack and Oil/Water Separator (SWMU 27N)
n. NGTC Block 9700 Motor Pool Wash Rack and Oil/Water Separator (SWMU 27O)
o. NGTC Block 9500 Motor Pool Wash Rack and Oil/Water Separator (SWMU 27P)
p. NGTC Block 9400 Motor Pool Wash Rack and Oil/Water Separator (SWMU 27Q)
q. 396 Transportation Company Wash Rack and Oil/Water Separator (SWMU 27R)
r. Two (2) 103d MI BN Wash Racks and associated two (2) Oil/Water Separators (SWMU 27S)
s. Two (2) Wright Army Airfield Wash Racks and associated Oil/Water Separator (SWMU 27U)
t. Auto Craft Center Oil/Water Separator (SWMU 27V)
u. DEH Asphalt Tanks (SWMU 31)
v. Supply Diesel Tank (SWMU 32)
w. DEH Equipment Wash Rack (SWMU 34)
x. NGTC Equalization Basin (SWMU 37)

Please note that a final decision concerning the corrective action status of the SWMUs listed above will be made by GA EPD through issuance of a Notice of Decision documenting the next modification of your Permit.

7. With respect to the Third (3d) Inf. Engineer Brigade Motor Pool and associated two (2) Oil/Water Separators (SWMU 27F), GA EPD tentatively concurs with the Fort Stewart recommendation that NFA is warranted for the Oil/Water Separator located Northeast of Building 1340. However, consistent with our Comment No. 5 in correspondence (Khaleghi to Perez) dated July 14, 1999; GA EPD will not separate this Oil/Water Separator from the one located Northwest of Building 1340 by further subdividing SWMU 27F in Appendix A of your Permit. Please also note that the investigation results of the second Oil/Water Separator are documented in the Addendum for SWMU 27F/Northwest of Building 1340 dated August 2000 which was received by GA EPD on August 30, 2000 and is currently in process for review by our agency.

8. With respect to the GANG MATES Motor Pool and associated two (2) Oil/Water Separators (SWMU 27J), GA EPD tentatively concurs with the Fort Stewart recommendation that NFA is warranted for the Oil/Water Separator located at Building 10535. However, consistent with our Comment No. 5 in correspondence (Khaleghi to Perez) dated July 14, 1999; GA EPD will not separate this Oil/Water Separator from the one located at Building 10531 by further subdividing SWMU 27J in Appendix A of your Permit. Please also note that the investigation results of the second Oil/Water Separator are documented in the Addendum for SWMU 27J/Building 10531 dated July 2000 which was received by GA EPD on July 20, 2000 and is currently in process for review by our agency.

9. Fort Stewart has submitted Addenda to the Phase RFI Report for 16 SWMUs dated April 2000 for the following SWMUs.

    a. Old Radiator Shop/Paint Booth (SWMU 24B)
    b. DOL Maintenance Motor Pool and associated two (2) Oil Water Separators (SWMU 27H/Buildings 1056 & 1071)
    c. NGTC Block 10200 Wash Rack and Oil/Water Separator (SWMU 27L)
    d. 293 MP Company Wash Rack and Oil/Water Separator (SWMU 27T)

    Please note that the investigation results documented in the Addenda for SWMUs 24B, 27H, 27L and 27T have been received by GA EPD and are currently in process for review by our agency.

Should you have any questions concerning this correspondence, please contact Brent Rabon of my staff at (404)656-2833.

Sincerely,

Bruce Khaleghi, Unit Coordinator
Hazardous Waste Management Branch

c: Mr. Larry Rogers, GA EPD-Southeast Regional Office
File: Fort Stewart(R)
R:\BRENTR\STEWART\16SWMUS\PHASEIIIRFIREPORTAPPROVAL