



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 27 2011

Via Delivery as Email-attachment to Prashant.gupta@honeywell.com and U.S. Mail

Mr. Prashant K. Gupta
Honeywell International, Inc.
4101 Bermuda Hundred Road
Chester, VA 23836

SUBJECT: LCP Chemicals Superfund Site, Brunswick, Glynn County, GA Status Letter for Parcel B05308053001 and Tract 4 of Parcel B007800000001

Dear Mr. Gupta:

I am writing in response to your request for a status letter for the LCP Chemicals Superfund Site (Site) and Honeywell International, Inc.'s (Honeywell's) interest in selling parcel B05308053001 and tract 4 of Parcel B007800000001, located at 4375 Ross Road, Brunswick, GA 31520. These two areas are portions of the Site. Both areas comprise Quadrant 1, as defined in the current Baseline Human Health Risk Assessment for the Uplands, Operable Unit (OU) #3 of the Site. Enclosure 1 shows the areal extent of both parcels. My response is based upon the facts presently known to the United States Environmental Protection Agency (EPA or Agency) and is provided solely for informational purposes.

This letter also memorializes the Prospective Purchaser Inquiry conference call EPA representatives had with you and Mr. Tom Sublett, Chairman of the Glynn County Commissioners, on November 18, 2010. In that call, we addressed two (2) issues critical to the successful re-development of a Superfund site:

- (1) The current status of EPA's cleanup and EPA's future anticipated actions; and
- (2) The Bona Fide Prospective Purchaser (also referred to as BFPP) provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), 42 U.S.C. Section 9601 et seq., and other potentially applicable federal landowner liability protections.

Superfund Law

In response to the growing concern over health and environmental risks posed by hazardous waste sites, Congress passed the Superfund law, which required EPA to establish the Superfund program to address these sites. Contaminated sites are discovered by citizens, businesses, and local, state, or federal agencies. After a potential hazardous waste site is reported to EPA, the available information is recorded in EPA's data management system for

Superfund, which is known as the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS). You can find the CERCLIS database at www.epa.gov/superfund/sites/cursites/index.htm. (Click Search and then type in LCP Chemicals in the Site name field and hit enter, which will take you to the LCP Chemicals Superfund Site web page.)

EPA initially screens a potentially hazardous waste site to determine what type of action, if any, is necessary. The Superfund program may then perform a Preliminary Assessment and possibly a Site Inspection to determine whether contamination at the property is likely to require a federal cleanup response and whether the site should be added to the list of high priority hazardous waste sites known as the National Priorities List (NPL).

History and Status of Site

Industrial activities began at the Site in 1836, when construction was initiated on an approximately 4,000-foot segment of the Brunswick-Altamaha Canal that ran in a north-south direction along the interface between the upland and estuarine parts of the Site. The canal eventually extended about 12 miles from Academy Creek (Brunswick Harbor) north to the Altamaha River. The canal opened in 1854, but operated only until 1855. Waste-disposal and soil-filling activities appear to have occurred along parts of the canal that traversed the Site, in the north and south disposal areas.

The Atlantic Refining Company, a predecessor of Atlantic Richfield Company (ARCO), used the Site as a petroleum refinery from 1919 through approximately 1929. The refinery processed Gulf Coast and Mexican crude oil into finished products, which included light asphalt, fuel oil, lubricating oil, gas oil, kerosene, and gasoline. The boiler at the refinery was fueled by coal until 1922, after which oil was employed. Drawings prepared for the former Atlantic Refining Company in the 1930s show 12 above-ground petroleum and petroleum products tanks, with million-gallon capacities, located in Quadrant 1. Half of the tanks were located north of the southern boundary of the former theater area, and the remainder were located south of it.

Georgia Power purchased part of the Site from ARCO and operated an oil-fired power-generating facility from 1937 through 1950 that reached a generating capacity of 5,500 kW in 1941. The Dixie Paint and Varnish Company (which eventually became the Dixie O'Brien Corporation and, subsequently, a subsidiary of the O'Brien Corporation) purchased another part of the Site from ARCO in 1941, where it operated a paint and varnish manufacturing facility until 1955. Both Georgia Power and Dixie O'Brien activities were for the most part limited to quadrants other than Quadrant 1.

Allied Chemical and Dye Company (the predecessor to AlliedSignal, which merged with Honeywell) purchased the Site in 1955, with the exception of a 2.9-acre parcel still owned by Georgia Power. AlliedSignal constructed and operated a chlor-alkali facility at the Site, utilizing

the Solvay (mercury-cell) process. Primary products of the chlor-alkali operation were chlorine gas, hydrogen gas, and sodium-hydroxide solution.

LCP Chemicals-Georgia (which became a division of the now defunct Hanlin Group, Inc.) purchased all of AlliedSignal's part of the Site in 1979 and continued to operate the chlor-alkali facility until 1994, when operations were discontinued. In May 1998, Allied Signal (Honeywell) purchased the LCP property from the estate in bankruptcy.

Parcel B05308053001, formerly known as the Sunset Drive-In Theater, is comprised of 17.59 acres and is currently zoned as basic industrial. The parcel is the northern-most parcel comprising the LCP Chemicals Superfund Site. Tract 4 of Parcel B007800000001 is comprised of about 20.5 acres and is also currently zoned basic industrial.

EPA and the Georgia Environmental Protection Division (GaEPD) have approved the baseline ecological risk assessment for OU3 and are finalizing the baseline human health risk assessment. Upon approval of the baseline human health risk assessment, the remedial investigation and feasibility study will be developed, prior to EPA being in a position to issue a Record of Decision for OU3.

In a December 2010 draft of a Public Health Assessment (PHA), the Agency for Toxic Substances and Disease Registry (ATSDR) recommended that additional soil samples be collected from the former Sunset Theater parcel. In addition, ATSDR also recommended that sediment, surface water and fish samples be collected from the pond located on the parcel. Although no fish were found, sampling of the sediment and surface water took place in December 2010. The results from the December 2010 sampling were made available to EPA and GaEPD in early February 2011. Review of the historical and December 2010 data do not indicate a health concern for future commercial or industrial uses of parcel B05308053001 or tract 4 of Parcel B007800000001. Enclosure 2 shows the soil sampling locations in Quadrant 1. Please note that although petroleum and petroleum products tanks were once located in Quadrant 1, since the CERCLA statute excludes petroleum from the definition of hazardous substances, no sampling for petroleum has been conducted.

In addition to soil sampling, the groundwater in Quadrant 1 has been sampled on a number of occasions. There are five monitoring well clusters located in Quadrant 1 (Enclosure 2). Naphthalene has been detected in two of the five well clusters. Enclosure 3 shows the naphthalene concentrations, in parts per billion, in all five well clusters. Note that there is no federal or State of Georgia maximum contaminant level for naphthalene. EPA's current lifetime health advisory for naphthalene in groundwater is 100 parts per billion.

The soil in Quadrant 1 has recently been sampled and analyzed for dioxins/furans. Preliminarily, all results, in terms of 2,3,7,8-tetrachloro dibenzo-p-dioxin (2,3,7,8-TCDD) Toxic Equivalents (TEQ), are about six nanograms per kilogram or parts per trillion (ppt). To put this value in context, the EPA draft interim residential and commercial/industrial preliminary

remediation goals for TCDD TEQ in soil are 72 ppt and 950 ppt, respectively. Hence, dioxins/furans pose no health risk concern with respect to the reuse of Quadrant 1.

Proposed Reuse of the Site

It is my understanding from our conference call that Glynn County may purchase parcel B05308053001 to use for a county-operated detention facility. Based upon the facts presently known to EPA, the Agency has not identified any contamination which may need to be addressed under Superfund or any obvious incompatibility between the proposed use of parcel B05308053001 and potential cleanup remedies which may be implemented at other parcels comprising the LCP Chemicals Superfund Site.

Other than institutional controls associated with basic industrial zoning, there are no known institutional controls that are in place or that will likely be required for Parcel B05308053001 and tract 4 of Parcel B007800000001.

Please note that EPA cannot approve any specific use of any part of the Site. It is the owner's sole responsibility to ensure that any proposed use of Parcel B05308053001 and tract 4 of Parcel B007800000001 does not interfere with or impede the cleanup at the Site, interfere with any institutional controls required in the future, or further contribute to contamination at the Site. Glynn County, or any other prospective purchaser, should consult with its own environmental professionals to obtain advice on the compatibility of any proposed reuse with EPA's cleanup.

Bona Fide Prospective Purchaser

On January 11, 2002, the Superfund law was amended by Congress to encourage prospective purchasers to buy and redevelop Superfund property. Prior to this amendment, purchasers of Superfund sites were potentially liable for the cleanup of the contaminated property upon purchasing the property. The amendment allows a purchaser to buy Superfund sites and avoid potential liability by qualifying as a "bona fide prospective purchaser." A prospective purchaser must achieve and maintain bona fide prospective purchaser status for as long as the potential Superfund liability exists. The bona fide prospective purchaser provision states that a person meeting the criteria of Section 101(40) of the Superfund law is protected from Superfund liability. However, to the extent that EPA's cleanup efforts increase the fair market value of the property, EPA may have a windfall lien on the property.

To qualify as a bona fide prospective purchaser, a person must meet certain threshold criteria and satisfy certain continuing obligations found in Section 101(40) of the Superfund law. Enclosed for your convenience is a copy of the March 6, 2003, "Interim Guidance Regarding Criteria Landowners Must Meet in Order to Qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner Limitations on CERCLA Liability" (Common Elements Guidance). The bona fide prospective purchaser provision is designed to be

self-implementing. This means that purchasers are responsible for achieving and maintaining bona fide prospective purchaser status. Glynn County, or any other prospective purchaser, and its legal counsel will need to assess whether it satisfies each of the eight (8) statutory requirements necessary to achieve and maintain bona fide prospective purchaser status.

Among other requirements, a bona fide prospective purchaser must take "reasonable steps" with respect to stopping continuing releases, preventing threatened future releases, and preventing or limiting human, environmental, or natural resources exposure to earlier releases. Based on the information EPA has evaluated to date, the Agency believes that the following would be appropriate reasonable steps a new owner of Parcel B05308053001 and tract 4 of Parcel B007800000001 should take:

1. Maintain the integrity of the fence surrounding the property;
2. Prohibit installation on the property of public or private wells for irrigation or consumption purposes;
3. Call EPA Region 4's Emergency Response Center hotline at (800) 424-8802 to report the discovery or release of any hazardous substances; and
4. Do not perform any activities or construct any structures that will or may interfere with EPA's investigation or cleanup or exacerbate contaminated conditions elsewhere at the LCP Chemicals Site.

If a new owner causes a release of hazardous substances due to its construction or operations, it may lose bona fide prospective purchaser status and all resulting liability protections.

Superfund Liens

EPA has not perfected a CERCLA Section 107(l) or Section 107(r) lien on Parcel B05308053001 or tract 4 of Parcel B007800000001.

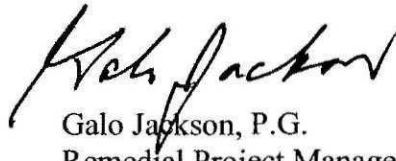
State Actions

EPA is only providing Honeywell with information regarding EPA's actions at the Site and the federal BFPP law. Honeywell or any other prospective purchaser should contact Jim McNamara at (404) 656-7802 for more information about potential state actions and liability issues related to Parcel B0530805001 and tract 4 of Parcel B007800000001.

Conclusion

EPA remains dedicated to supporting the revitalization of contaminated properties and hopes this information is useful to Honeywell, Glynn County, or any other prospective purchaser. This letter does not provide a release from Superfund liability, or from other liability or obligations under any other law. If Honeywell, Glynn County, or anyone else has any questions, please do not hesitate to call Karen Singer at (404) 562-9540 or me at (404) 562-8937.

Sincerely,

A handwritten signature in black ink, appearing to read "Galo Jackson". The signature is written in a cursive style with a large initial "G".

Galo Jackson, P.G.
Remedial Project Manager
Superfund Remedial Branch



Enclosures

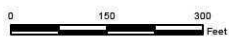
cc: J. McNamara, GaEPD

Enclosure 1: Parcel B053-08-053-001 and Tract 4 of Parcel 0078-00-000-001

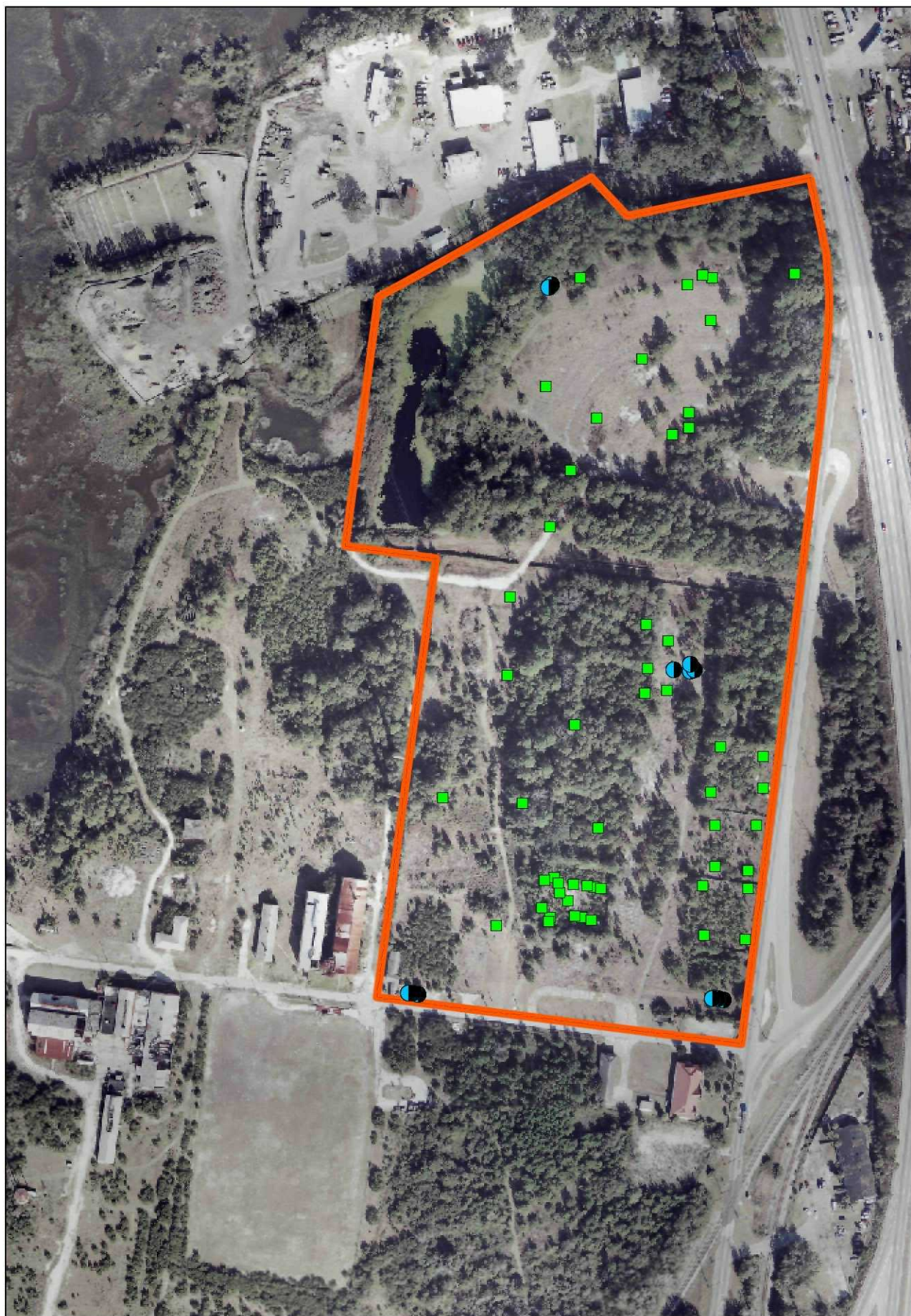


Legend

-  Parcel 0078_00_000_001 Tract 4
-  Parcel B053-08-053-001

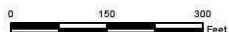


Enclosure 2: Quadrant 1 Soil Sampling and Monitoring Well Locations



Legend

- Soil Sampling Locations
- Groundwater Sampling Locations



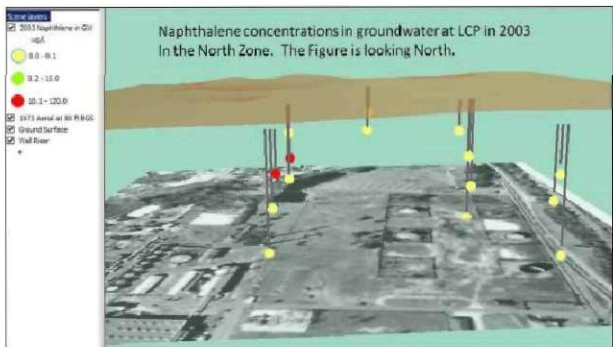
Enclosure 3: Naphthalene in Groundwater, Quadrant 1, LCP Chemical



LCP Chemical Area 1
Brunswick, GA
2003 Naphthalene in Groundwater
Remedial Screening Level is 0.1 ug/L
1973 Aerial Photograph



LCP Chemical Area 1
Brunswick, GA
2004 Naphthalene in Groundwater
Remedial Screening Level is 0.1 ug/L
1973 Aerial Photograph



LCP Chemical Area 1
Brunswick, GA
2005 Naphthalene in Groundwater
Remedial Screening Level is 0.1 ug/L
1973 Aerial Photograph



LCP Chemical Area 1
Brunswick, GA
2009 Naphthalene in Groundwater
Remedial Screening Level is 0.1 ug/L
1973 Aerial Photograph