



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

JAN 03 2013

Ref: 4WD-SRB

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

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

Re: Final Comments on November 2012 Draft of the Remedial Investigation Report for Operable Unit 3-Upland Soils: LCP Chemical National Priorities List Site, Brunswick, Glynn County, GA

Dear Mr. Gupta:

The purpose of this letter is to notify Honeywell International, Inc. (Honeywell) that the Environmental Protection Agency is hereby disapproving the company's November 2012 draft Remedial Investigation (RI) Report submitted for the Upland soils, designated as Operable Unit (OU3) of the LCP Chemical Superfund Site (Site). Pursuant to Section VIII of the Administrative Order by Consent for Remedial Investigation/Feasibility Study, Docket No. 95-17-C (RI/FS AOC), the EPA is directing Honeywell to cure the few remaining deficiencies, as described below, and resubmit the revised final draft RI for OU3 to the EPA for approval within thirty (30) calendar days of receipt of this letter. Please note that, pursuant to the RI/FS AOC, once the EPA approves or modifies a deliverable or portion thereof, Honeywell may not alter or amend such deliverable or portion unless directed by the EPA to so do.

Table of Contents

Starting with the page number for Section 4.2 through Section 10, the page numbering is off.

List of Tables

The title of Table 6-3 should be corrected to Summary of the OU3 BERA Preliminary Remediation Goals for Soil.

List of Figures

The title of Figure 4-1 should be changed to Upland Drainage Features to be the same as on the figure.

Figures 5-8a through Figure 5-8e are missing from the hardcopy of the RI made available.



List of Appendices

The title for Appendix B should be changed to *Comparison of Soil Data for COCs with Residential-Based RGOs*.

The title for Appendix C should be changed to *Spatial Analysis of Soil Data for Primary Ecological COCs*.

The title for Appendix D should be changed to *Evaluation of Soil Leaching Potential to Groundwater*.

Section 6.2.3.2

Page 23: Dichloromethane (methylene chloride) was omitted from the list of contaminants of potential concern (COPCs) in the embedded table in the page. This constituent has been identified as a COPC in Quadrant 3 of the approved Human Health Baseline Risk Assessment and therefore should be indicated in the table as such.

Section 8

Page 60: The embedded table does not contain benzene, which was included as one of the five analytes identified as remaining as a potential concern in the 2010 EPA comment memo. Benzene has historically been and is currently being found above the maximum contaminant level (MCL) in monitoring wells located on Quadrants 3 and 4. Although only a handful of soil samples in the OU3 dataset from both quadrants exceed the soil screening level (SSL), benzene was reported in the North Removal Area Close-Out Report's final confirmational samples, collected from four to-five feet below the base of the excavation. Please add benzene to the embedded tables in Section 8 and Appendix D (Table D-1).

Typo on page 60, 2nd paragraph, 2nd sentence: "...as the cleanup *progressed* across the Site."

Typo on page 60, 3rd paragraph, 2nd sentence: "...to direct clean surface water *runoff* away from..."

Figures

Figure C-6f: The title refers to Aroclor 1268. It should be 1260.

Appendix C

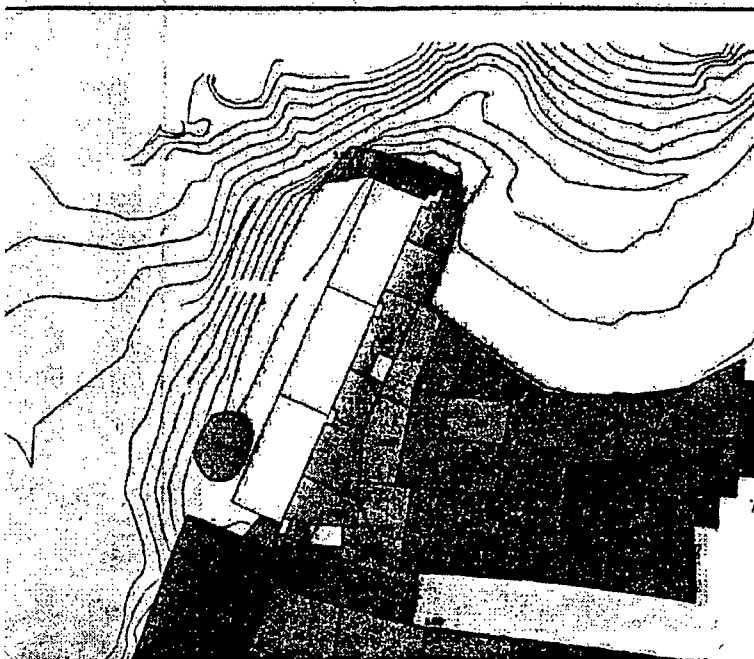
The removal areas shown on the figures obstruct the view of the grids. Please fade-out the removal area color so that the grids may be seen.

Page C-4 of Appendix C discusses the distribution of lead in surface soils of OU3. The uplands were gridded out, and average concentrations within the grids were plotted on the figures. The

text does not mention that the concentrations of lead in soils are above the 400 mg/kg preliminary remediation goal (PRG) for the mourning dove in Grid Cell 133 when the one sample from TEG is eliminated. The three non-TEG samples have lead concentrations of 922, 1580, and 832 mg/kg. Grid Cell 133 is located adjacent to the southern portion of the Dillon Duck and is in a habitat area. Soils on the shore of the Dillon Duck could erode into the pond. Waterfowl accessing the pond from the shores could come into contact with elevated lead in soils and become exposed through incidental ingestion of soils. Lead concentrations in soils are relatively low apart from within Grid Cell 133. The text should mention that the highest average concentration of lead in soils is located in a habitat area.

Note that the figure in the December 1997 North Area Close-Out Report, showing the removed characterization/confirmational sampling locations, does not show the three samples located in Grid Cell 113 referred to above. The characterization samples table in the report does list the three samples. The field note on the August 30, 1996 chain-of-custody form describes the three samples as having been collected along the "edge of marsh along east side of N(orth) S(eparator)." Further, the as constructed excavation figure included in the Close-Out Report (reproduced in part below) shows the area immediately east of the North Separator having been removed and backfilled. It is unclear whether the area represented by these three samples was removed. This requires further investigation.

NORTHWEST AREAS



Typo on page C-3, Methods, 3rd sentence: "...several different data *treatment* approaches..."

Typo on page C-5, last paragraph, 4th sentence, please insert a comma after 5, as in "Under Scenario 5, which uses the..."

Page C-6, first full paragraph: The last sentence, which starts with "Furthermore..." is actually two complete sentences. Please revise.

Typo on page C-6, 3rd full paragraph, 3rd sentence: "...grid cells are not *contiguous*."

Page C-6, 2nd sentence, 1st full paragraph: The sentence refers to a memo, perhaps it should refer to an *appendix*.

Page C-7: Risk Management Considerations, indicated that the basis for the preliminary remedial goals was, "laden with uncertainties inherent in both the estimates of exposures and the estimates of toxicity." The sentence which reads, "However, the cumulative effect of these conservative choices often results in grossly exaggerated estimates of potential harm to ecological receptors." should be removed or modified because it is itself an exaggeration. The risk assessment did not use minimum body weights or maximum ingestion rates. Central tendency estimates were used for all exposure assumptions in the ecological risk assessment. No uncertainty factors were used. There are uncertainties in the ecological risk assessment, but the actual risks could be greater than or less than the estimates provided in the risk characterization. Text should be modified to specify that "... it is *the potentially responsible parties' belief* that the cumulative effect of these conservative choices often results in grossly exaggerated estimates..."

Page C-9: The embedded table contains cell numbers from 1 through 9. The cell numbers have been revised to the 30s, 40s and 50s (see Figure C-9a).

Figure C-1: The symbols on the legend do not correspond to the symbols used on the figure. Please correct.

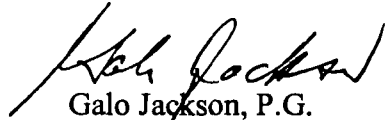
Figure C-7f is not explained well in the text. The figure shows a cluster of TEG samples with concentrations between 10 and 50 mg/kg and over 50 mg/kg in the northern section of Grid Cell 75. The figure has a shaded overlay across the area of the cluster of higher concentrations. The shaded overlay is similar in appearance to the cross-hatch shading used to designate an area that is capped. However, there is no soil cap in the area with the cluster of TEG samples with elevated PCB concentrations in soil. The area in the northern portion of Grid Cell 75 with the cluster of samples from the TEG on-site laboratory appears to have uncertain but potentially elevated PCB concentrations. There were two samples that are not from the TEG laboratory in Grid Cell 75. The samples that are not from the TEG laboratory have lower concentrations, but the non-TEG samples are not located near the cluster of TEG samples with the higher concentrations. The uncertainty regarding the concentrations of PCBs in Grid Cell 75 should be addressed in the feasibility study. Note that some of the TEG symbols are not color coded to reflect their concentration.

Appendix D

Page D-3: For Quadrant 3, the compound listed should be 1,24-trimethylbenzene, rather than 2,4-trimethylbenzene.

If you have questions regarding the preceding, please contact 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

cc: J. McNamara, GaEPD

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PS Form 3800, June 2002

See Reverse for Instructions