UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8960

June 24, 2021

Via Delivery as Email-attachment

Mr. Prashant K. Gupta
Honeywell, Inc.
115 Tabor Road
Morris Plains, NJ 07950

Dear Mr. Gupta:

The purpose of this letter is to approve your submission of the "Revised Identification Of Constituents of Potential Concern And Exposure Assessment - Human Health Baseline Risk Assessment Technical Memorandum for the LCP Chemicals Site, Brunswick, Georgia," dated March 2021 (hereinafter referred to as the OU2 Revised BRA Memo) to be used to develop the full Baseline Risk Assessment (BRA) for the Remedial Investigation (RI) Report as required under the 1995 Administrative Order by Consent. The comments below were generated by EPA's review of the OU2 Revised BRA Memo and should be used to prepare the BRA document in RI Report itself, rather than revising the OU2 Revised BRA Memo.

In general, EPA accepts the data and the methodology used to evaluate the groundwater conditions for the OU2 Revised BRA Memo. However, it is noted that additional groundwater sampling may be needed before the remedy selection to ascertain the groundwater conditions at the time of remedy selection and that groundwater sampling will be required during the post-ROD phases of the NPL site.

EPA has also commented on the Supplemental Site Characterization Work Plan for Operable Unit 2: Cell Building Area Surface Soil, dated March 2021. Some of the EPA comments on the OU2 Surface Soil Workplan are resolved by the information in the OU2 Revised BRA Memo. However, some of the EPA comments remain unresolved. Please respond to the comments on the OU2 Surface Soil Workplan within 30 days, noting which ones are now resolved by the OU2 BRA Memo so that the OU2 Surface Soil Workplan can be finalized and the field work needed for the RI completed.

If you have questions regarding the preceding, please contact me at (404) 562-8506 or pope.robert@epa.gov. Note that due to the EPA Region 4 response to the COVID-19 Coronavirus situation, hard copies of documents are difficult to receive, so it is requested that submittals be made by electronic methods as much as possible until the EPA Region 4 offices are fully re-opened.

Sincerely,

ROBERT POPE Digitally signed by ROBERT POPE
Date: 2021.06.24 14:05:21 -04'00'

Robert H. Pope, Senior Remedial Project Manager
Restoration & Sustainability Branch
Superfund and Emergency Management Division

Enclosure

cc: Melanie S. Jablonski, Georgia Power
Stephen P. Gonzalski, BP Corporation
J. McNamara, GAEPD

GENERAL COMMENTS

1. EPA notes there is a formatting issue in the document. Section numbers in the Table of Contents do not agree with body of the Tech Memo. The Table of Contents has the Sections listed in numerical order (Sections 1 through 6) as expected. The body of the document, however, has Sections 1, 2, 3, 5, 6, 7 (skips section 4).

2. EPA requests that it be stated clearly in the forthcoming Human Health Baseline Risk Assessment and in the Remedial Investigation Report that groundwater is assessed based on its maximum beneficial use.

3. Section 5.5 (pg 14); Attachment C tables. Many of the inputs for the exposure parameters cite "RSL" as the basis for the values. RSLs (EPA Regional Screening Levels) should rarely, if ever, be cited for exposure inputs. The actual guidance document from which the value came (e.g., EPA Updated Superfund Standard Default Exposure Factors, etc.). The only time the RSLs might be cited is for a value that has no cite-able source; in that case though, the citing would be something like "Professional judgment, as derived and used in the RSL calculations". EPA requests that this be corrected in the forthcoming Human Health Baseline Risk Assessment and in the Remedial Investigation Report.

4. Tables C-5a, C-5B. The water-to-air Volatilization Factor (K constant) of 0.5 L/m3 is a conservative value that is good for screening but should be adjusted based on pertinent Agency guidance in the HHBRA beyond the screening step. EPA Region 4 recommends a K value of 0.13 L/m3 based on Region 4 and Agency-wide guidance regarding the assumption of daily shower exposure (inhalation & dermal) being equivalent to daily water ingestion. EPA requests that this be corrected in the forthcoming Human Health Baseline Risk Assessment and in the Remedial Investigation Report.

5. The RTC for EPA General Comment #17 states that the statement "Indicates incomplete pathways that are still being evaluated quantitatively" has been removed from Figure 6 (CSM). However, an inspection of this figure in the revised document still shows this statement to be there. EPA requests that this be corrected in the forthcoming Human Health Baseline Risk Assessment and in the Remedial Investigation Report.