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

July 6, 2020

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 comment on your submission of the Site Characterization Summary Report Operable Unit 2 (OU2) Site-Wide Groundwater and Cell Building Area for the LCP Chemicals Site, Brunswick, Georgia dated February 2020 (hereinafter referred to as the OU2 Revised SCSR). While the OU2 SCSR addresses the majority of issues discussed previously, there are a few issues that are still required to be addressed. In addition, the State of Georgia has provided a list of issues to be addressed further. The attached comments must be addressed, and the document revised. As agreed to in the last project meeting EPA offices in Atlanta, Georgia, Honeywell should use these comments to guide the next round of groundwater sampling in 2020 so that the needed data is available to develop a full Remedial Investigation and Feasibility Study as required under the 1995 Administrative Order by Consent for Remedial Investigation/Feasibility Study (RI/FS). Responses to the comments must be submitted to EPA within 30 days from receipt of this letter. Included in EPA's comments is a table listing wells which EPA requests sampling to ensure adequate data is available for the RI. It is requested that these wells be sampled during the upcoming site-wide sampling effort. Please sample these wells as failure to do so will likely result in data gaps for the RI requiring additional sampling to occur before the RI can be finalized. Also, draft comments provided by the State of Georgia are included in this correspondence.

Once all comments are addressed and the OU2 SCSR is finalized, EPA further requests a schedule be developed and presented to EPA for submittal of the RI and the FS. It is EPA's expectation that a Draft RI be submitted no later than early 2021. It is EPA's goal to finalize the RI during 2021 and have a Draft Feasibility Study (FS) submitted no later than the end of 2021.

If you have questions regarding the preceding, please contact me at (404) 562-8506 or [HYPERLINK "mailto: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, and 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 H. Pope, Senior Remedial Project Manager
Restoration & Sustainability Branch
Superfund and Emergency Management
Division

cc: J. McNamara, GAEPD

TECHNICAL REVIEW OF THE
REVISED SITE CHARACTERIZATION SUMMARY REPORT OPERABLE UNIT 2 (OU2) SITE-WIDE GROUNDWATER AND CELL BUILDING AREA FOR THE LCP CHEMICALS SITE, BRUNSWICK, GEORGIA DATED 2020 (HEREINAFTER REFERRED TO AS THE OU2 SUMMARY REPORT) FOR THE LCP CHEMICALS SITE, BRUNSWICK, GEORGIA.

I. GENERAL COMMENTS

1. Please note that conservative estimates regarding the extent of some COCs will be necessary for evaluating the risks present at the site in the RI/FS without additional monitoring wells. Furthermore, these estimated extents of areas where the data shows COCs above likely remediation objectives are not presented, and the RI/FS will still be evaluated for data gaps if these estimates lend to uncertainty regarding risk assessment.

2. Please note that EPA requests that spatiotemporal modeling of the contaminants using 2018 to 2020 data be presented in the RI/FS.

3. Figure 3.1, Potentiometric Surface and Groundwater Flow: Satilla Formation and Figure 3.2, Potentiometric Surface and Groundwater Flow: Ebenezer Formation: The figures do not include the monitoring well IDs. In addition, Figure 3.1 indicates that green-colored monitoring wells were not used for the potentiometric surface interpretation, but rationale for this decision is not provided on the figure or discussed in Section 3.4, Potentiometric Surface and Groundwater Flow. Please add the rationale for this decision to the text.

4. Appendix B, Electronic Copy of Groundwater Data Trend Viewer (Excel Pivot): The y-axis for all parameters is presented as micrograms per liter (µg/L); however, the field parameters included in this table are not reported in µg/L. While the reason for this in the document is acceptable and the viewer is a useful tool, EPA requests that graphical plots be included in the RI/FS with correct label axes.

5. Please note, that EPA requests that the Depth to Water (DTW) measurements of the "D" wells be performed in the upcoming CBP semi-annual monitoring event and reported in the RI/FS.

6. EPA notes that there appears to be very high concentrations of all COCs at or near MW-111 with no horizontal extent demonstrated north/northeast/northwest/east. EPA requests descriptive details be presented in the text of the document and the upcoming RI/FS for clarity.

7. EPA notes that there is a disconnect between the figures and pivot tables used for data evaluation which can confuse interpretation. A single figure for each COC with each well identified along with sample results or isoconcentration maps would clearly depict exceedances and how the extent of contamination is currently being depicted. EPA requests that these types of figures be provided in the RI/FS for clarity in addition to the pivot tables.

8. A review was conducted of the figures provided within the OU2 Site Characterization Summery Report. Presently there are no monitoring wells located up-gradient within the general area of monitoring well (MW) MW-111, which is also adjacent to the wetlands area of the Site. There are elevated detections for Site related COCs within MW-111, for example benzene, benzo(a)anthracene, naphthalene, and 1-methyInaphthalene. EPA requests additional sampling for MW-111. In addition, the origin of the elevated detections for Site related COCs within MW-111 should be addressed in the RI and will need to be addressed in any remedies considered in the Feasibility Study, as appropriate.

9. EPA is specifically interested in MW-356B for the previous elevated detections of mercury. Mercury detections within this well have continued to increase over time, until the 2018 sampling event, when mercury detections went from 34.39 to 1.2 ug/l. It is unclear if the sudden decrease in mercury at this location is due to field sampling/lab error or if mercury has truly decreased in concentration. The adjacent shallow well MW-356A also had an elevated detection for mercury in 2018 (162 ug/L). The EPA requests that MW-356B be sampled prior to the RI.

10. EPA is specifically interested in MW-113C for the elevated detections for naphthalene. In 2012 naphthalene was reported at 0.68 ug/L, and in 2018 it was reported at 26 ug/L. Over the six-year period naphthalene has increased in detection. Monitoring well locations within the boundaries of the Site that have elevated detections above the tapwater value of 0.12 ug/L for naphthalene will still need to be addressed in the future. EPA requests that MW-113C be sampled prior to the RI.
11. Please see a table below which lists wells EPA requests to be sampled for the RI to ensure there are not data gaps. EPA requests these wells be sampled during the next site sampling event.

Limited Data Points	**Elevated Detections**	**Confirm Decreasing Trends**	
MW-1B	HWEast4	HWEast5	
MW-306A	HWWest2	MW-111A	
MW-361B	HWWest3	MW-112B	
MW-362A	MW-131	MW-112C	
MW-362B	MW-132	MW-113A	
MW-506A	MW-135	MW-113C	
MW-510A	MW-304	MW-115A	
MW-507A	MW-353B	MW-115D	
	MW-365B	MW-301B	
	MW-357A	MW-505A	

	MW-358B	MW-513A	
	MW-360D	MW-516B	
	MW-503B	MW-517B	
	MW-504A		
	MW-506B		
	MW-507B		
	MW-509B		
	MW-512B		
	MW-513B		
	MW-515B		
	MW-516A		
	MW-517A		

DRAFT COMMENTS PROVIDED BY THE GEORGIA ENVIRONMENTAL PROTECTION DIVISION ON THE SITE CHARACTERIZATION SUMMARY REPORT OPERABLE UNIT 2 (OU2) SITE-WIDE GROUNDWATER AND CELL BUILDING AREA FOR THE LCP CHEMICALS SITE, BRUNSWICK, GEORGIA DATED FEBRUARY 2020

Previous GEPD comment number 7. Please re-read. EPD's statement is that if Arsenic detections at the site were attributable to background (rather than site operations) the Arsenic results in Table 4.2c "…would not be mostly non-detect…", which the RPs point out (and EPD agrees) that they are.

Previous GEPD comment number 17) Response does not address the comment. In instances where detection limits are above the MCL, the color-coding should reflect contamination, consistent with risk assessment methodology that requires evaluation of constituents where detection limits are above a screening level. Failure to show detection limits above the MCL as exceedances "…shows a misleading depiction of groundwater contamination…"

Previous GEPD comment number 18) Two "<0.25" locations south of the causeway and one "<0.05" location in the SE corner of Cell Building #2 do not have ND (or any other) sample indicator, only the numerical value.

Previous GEPD comment number 19) What is the timeframe for the sample results shown on Figure 5-12 B and C? EPD compared them with the 2018 results on Figure 5-12E, thus our comment. Re-review of the document and figures does not provide any indication of the dates of the analyses shown on the figures, except for the spatio-temporal presentation on Figure 5-12E.