



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

Ref: 4WD-SRB

APR 06 2011

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

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

Re: Outstanding Issues from OU3 (Uplands) Baseline Human Health Risk Assessment:  
LCP Chemical National Priorities List Site, Brunswick, GA

Dear Mr. Gupta:

Following consultation with the Georgia Environmental Protection Division, the purpose of this letter is to resolve three of the four remaining issues related to the OU3 (Uplands) Baseline Human Health Risk Assessment (HHRA).

1. Surrogates: Residential Screening Levels (RSLs) may be used to screen-out analytes for which surrogates were previously recommended.
2. Calculation of the exposure point concentration (EPC) for Aroclor-1260 in Quad 4: The full detection limit (DL) and one half the DL should be used to calculate two separate EPCs. Once these EPCs are calculated, the risk calculations should use the EPC based on one half the DL.
3. As discussed previously in meetings and through e-mail, if in an exposure unit less than 10% of the DLs are above EPA's Contract Required Quantitation Limit, or less than 5% of the detection limits are above the residential screening level (RSL), the following procedure should be used to support further elimination of analytes in the screening process. Analytes may be further screened-out, as a refinement process, based on the following: a) no past use of the chemical or analyte at the Site, b) demonstration that analyte was not detected in an exposure unit prior to removal or c) the analyte has not been detected in an exposure unit and there are at least 10 instances of Level IV analyses in an exposure unit, with DLs below the RSL. The reasons for elimination of analytes should be qualitatively discussed in an additional step, as part of the refinement process. Any one of the three conditions (a, b or c) would have to be met in order to support elimination of an analyte.

All of the B-flagged analytes, shown on the exhibits attached to your April 2010 letter, would still appear in the screening tables and undergo the screening process using the appropriate RSLs, but a qualitative screening step would also be used to refine the contaminants of potential concern selection process for those constituents.

Within 14 days of receipt of this letter, please send me revision to the exhibits attached to your April 2010 correspondence, so that EPA may review the logic of the COPC refinement process, prior to revising the OU3 HHRA.

I will address the leaching to groundwater in a separate correspondence, in the near future.

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 fluid and cursive, with a large initial "G" and "J".

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

cc: J. McNamara, Georgia EPD