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ATLANTA, GEORGIA 30303-8960

MAY 18 2011

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: Revised Draft Work Plan (Work Plan) for the Development, Design, and Implementation of Conventional Treatment Measures to Enhance the Existing Caustic Brine Pool (CBP) Remedy at the LCP Chemical Site, Brunswick, Glynn County, GA

Dear Mr. Gupta:

The purpose of this letter is to approve the April 4, 2011 draft of the above-referenced Work Plan.

I have requested a current determination of acceptability for Water Recovery, Inc's, Jacksonville, FL facility. Unfortunately, I cannot accommodate your request for a year-long determination of acceptability, since verifications of continued acceptability are valid for only 60 days. As a result, a determination will have to be made every 60 days.

Please note that EPA will be focusing on insuring that the on-site treatment process is adequately investigated, since on-site treatment will not require transportation of the CBP offsite (off-site transportation could unfavorably extend the duration of the Time-Critical Removal Action). As you know, the caustic brine is migrating vertically through the cemented sandstone and contaminating the Miocene aquifer, with the result that the following sampling stations are showing increasing concentrations of mercury: HW-East 4, HW-East 5, HW-West 1, HW-West 2, HW-West 3, and HW-West 4 (Enclosure 1). The following sampling stations are showing impacts of the caustic migrating into the Miocene aquifer: HW-East 4, HW-East 5, HW-West 1, HW-West 2, HW-West 4, HW-West 5, and HW-West 6 (Enclosure 2). In addition, chromium concentrations have been detected above the federal maximum contaminant level (MCL) in the following wells: HW-East 5, HW West-2, and HW West-3 (Enclosure 3). Vanadium has been observed to be increasing in the following sampling stations: HW-East 5, HW-West 1 and HW-West 2 (Enclosure 4). Arsenic was been found above the MCL in the following wells: HW-West 2, and HW-West 3 (Enclosure 5).

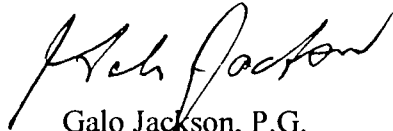
The November 21, 2007 memorandum from Mr. Kirk Kessler to Mr. Mark Kamilow, reporting the results of the step-drawdown tests, indicated that the 12 wells evaluated had a combined recovery rate of 91 gallons per minute or 131, 000 gallons per day. At this rate, the estimated 25 million gallons of CBP could be extracted in 190 days, much less time than the 15 years and 3,000 truck loads I estimated in my March 6, 2011 letter for off-site treatment and



disposal. In light of the continued migration of the hazardous substances listed above, a decade-long duration for this Time-Critical Removal Action will not be acceptable.

If you have any questions about this letter, you may contact me by telephone at (404) 562-8937 or by e-mail at jackson.galo@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Galo Jackson". The signature is fluid and cursive, with the first name "Galo" being more prominent than the last name "Jackson".

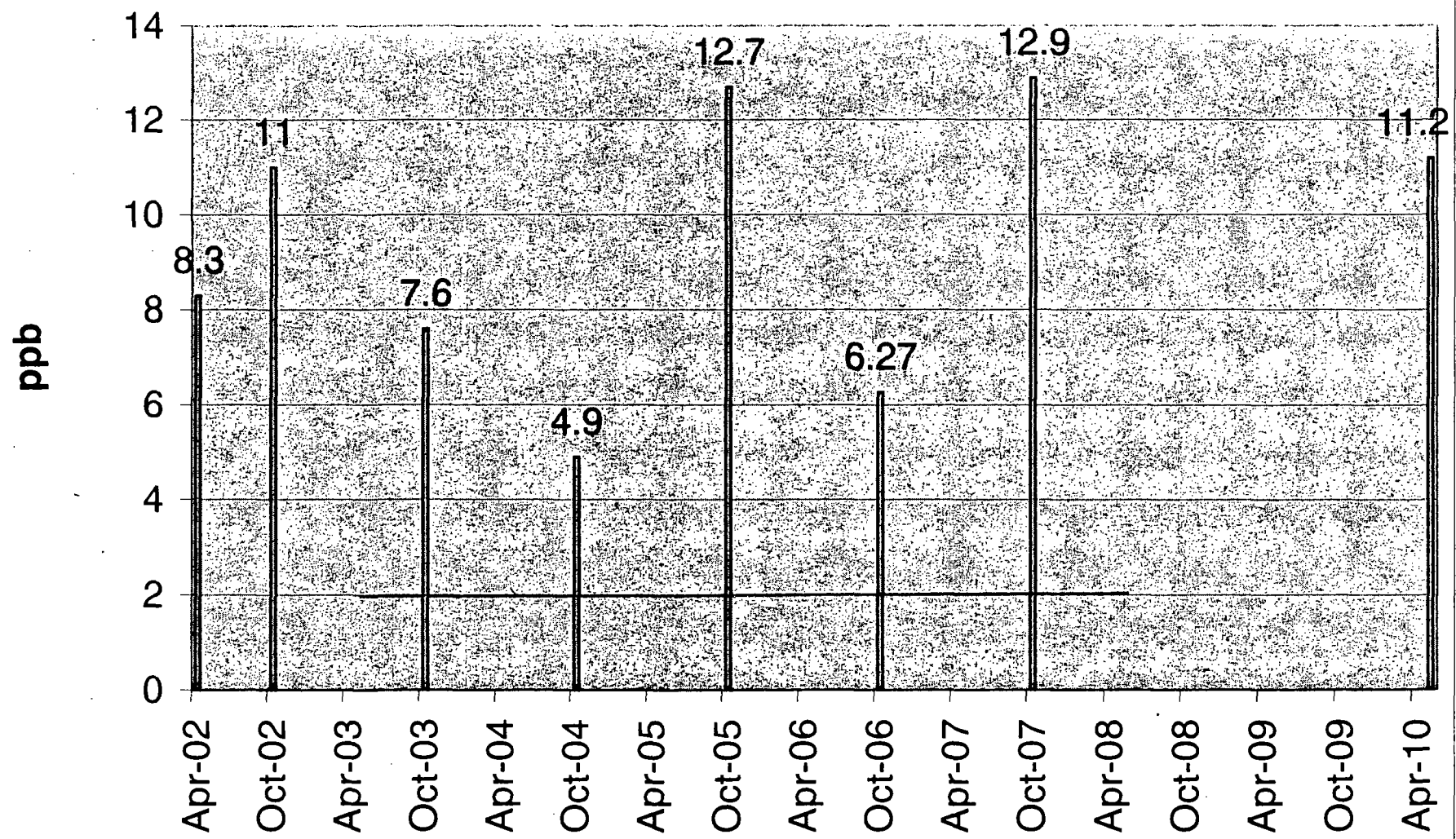
Galo Jackson, P.G.
Remedial Project Manager
Superfund Remedial Branch

enclosures

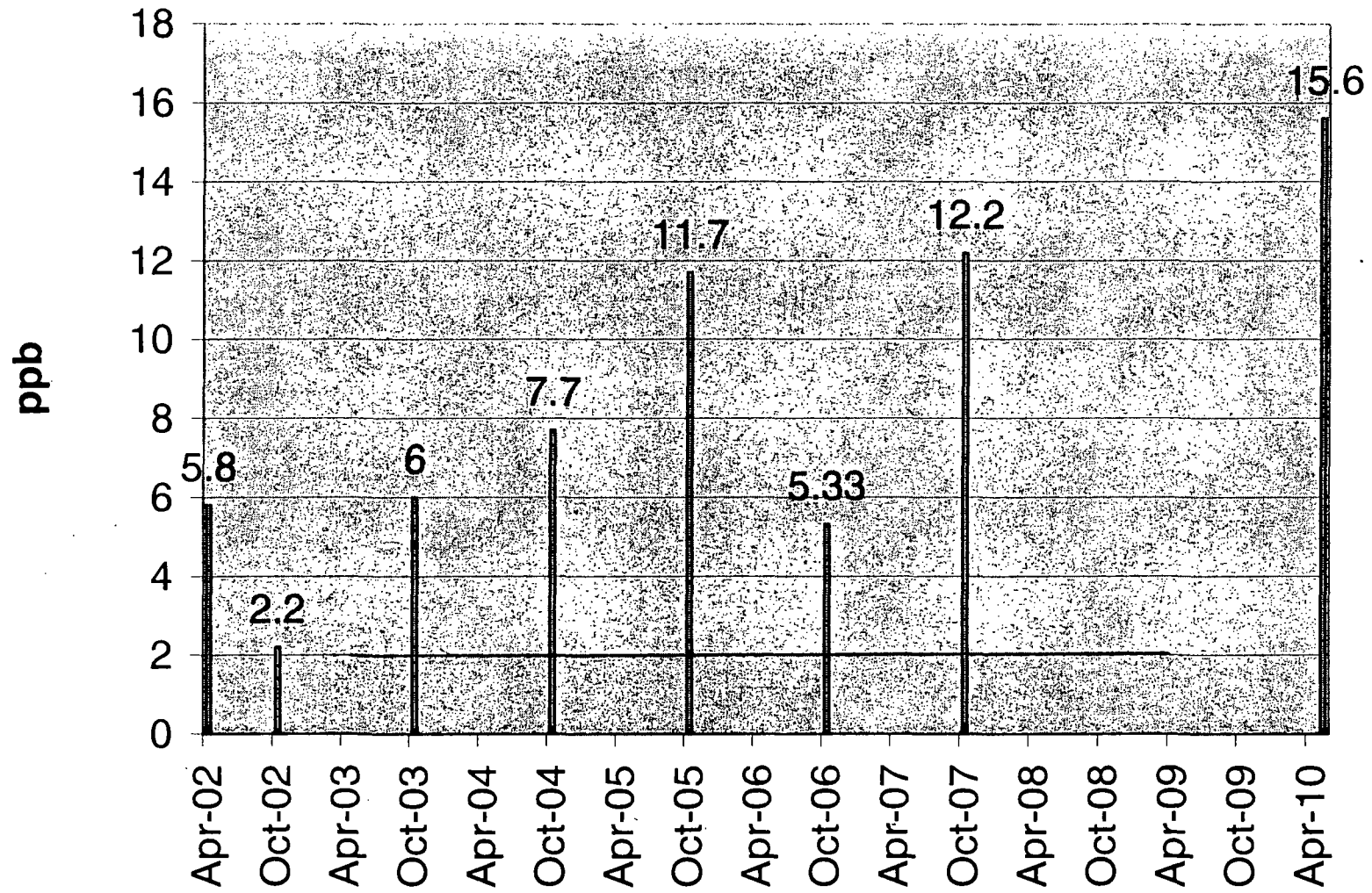
cc: J. McNamara, Georgia EPD

ENCLOSURE 1

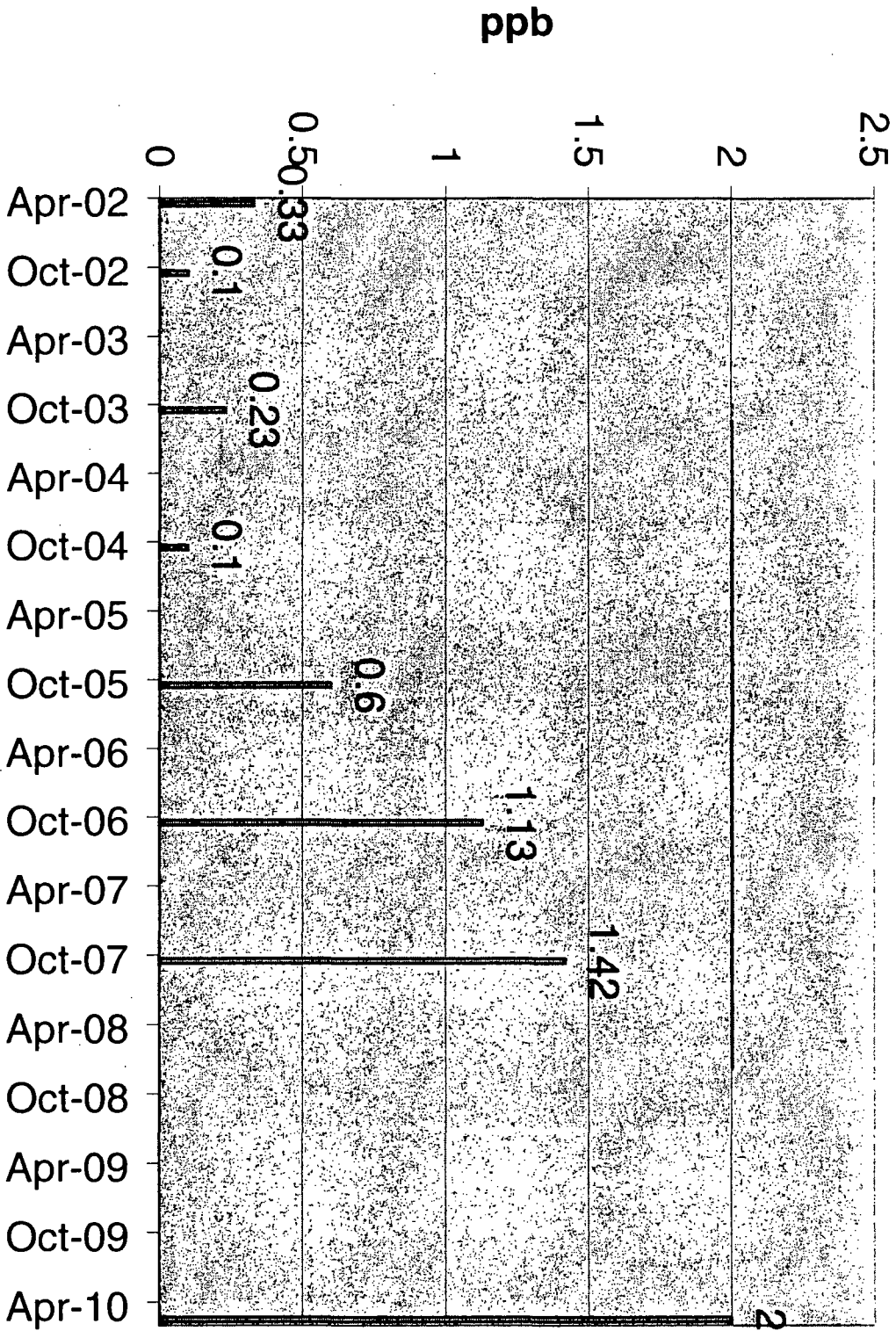
Mercury: HW East 4



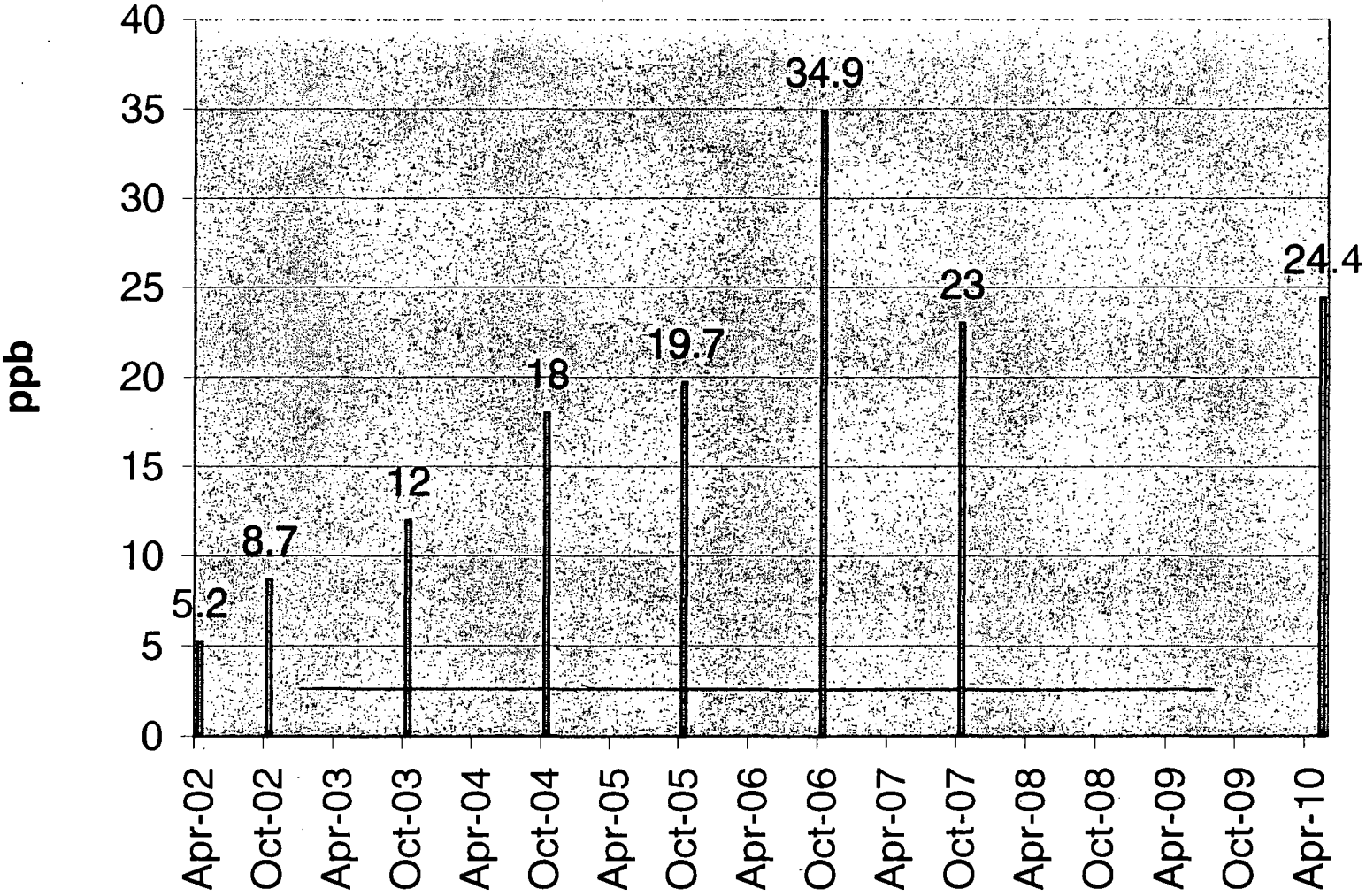
Mercury: HW East 5



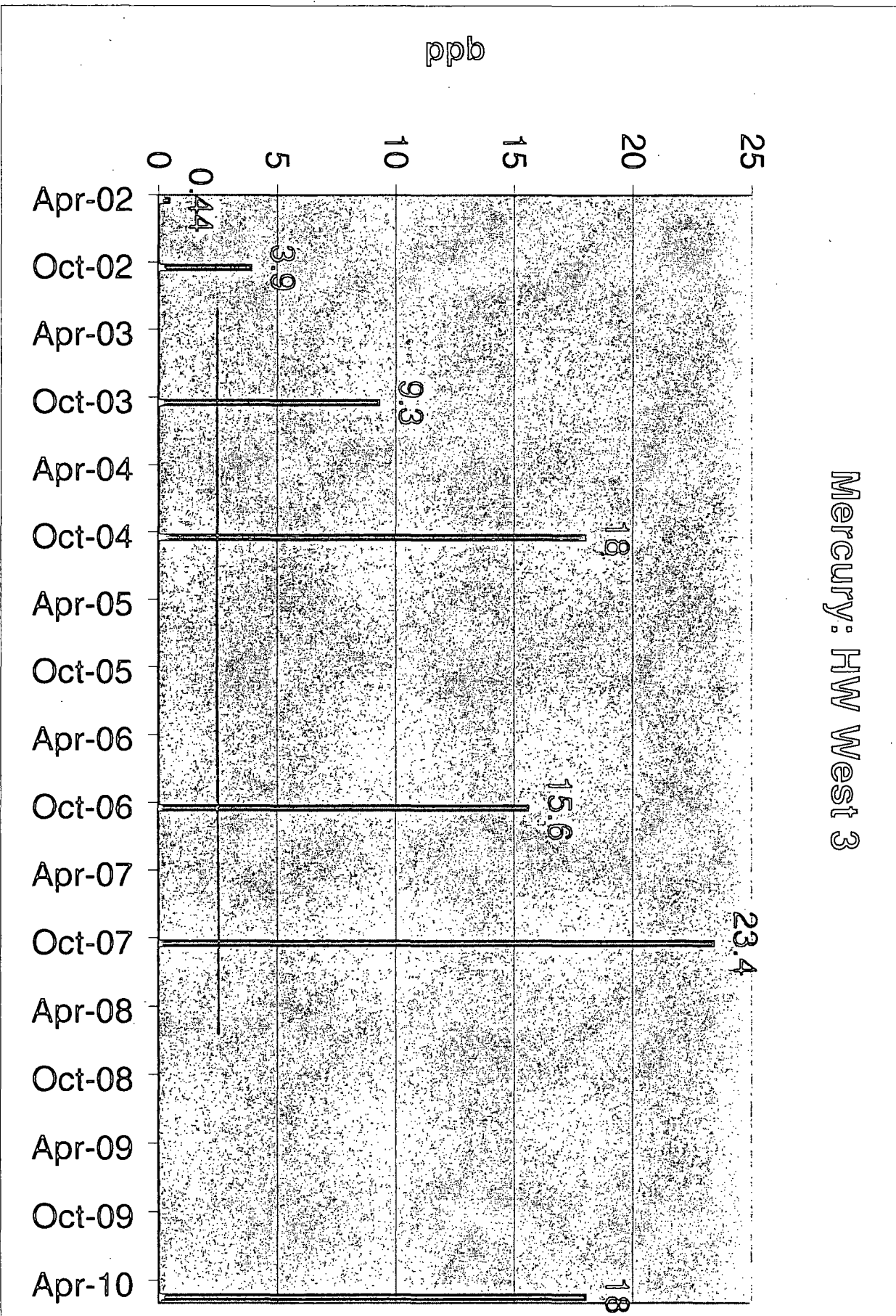
Mercury: HW West 1



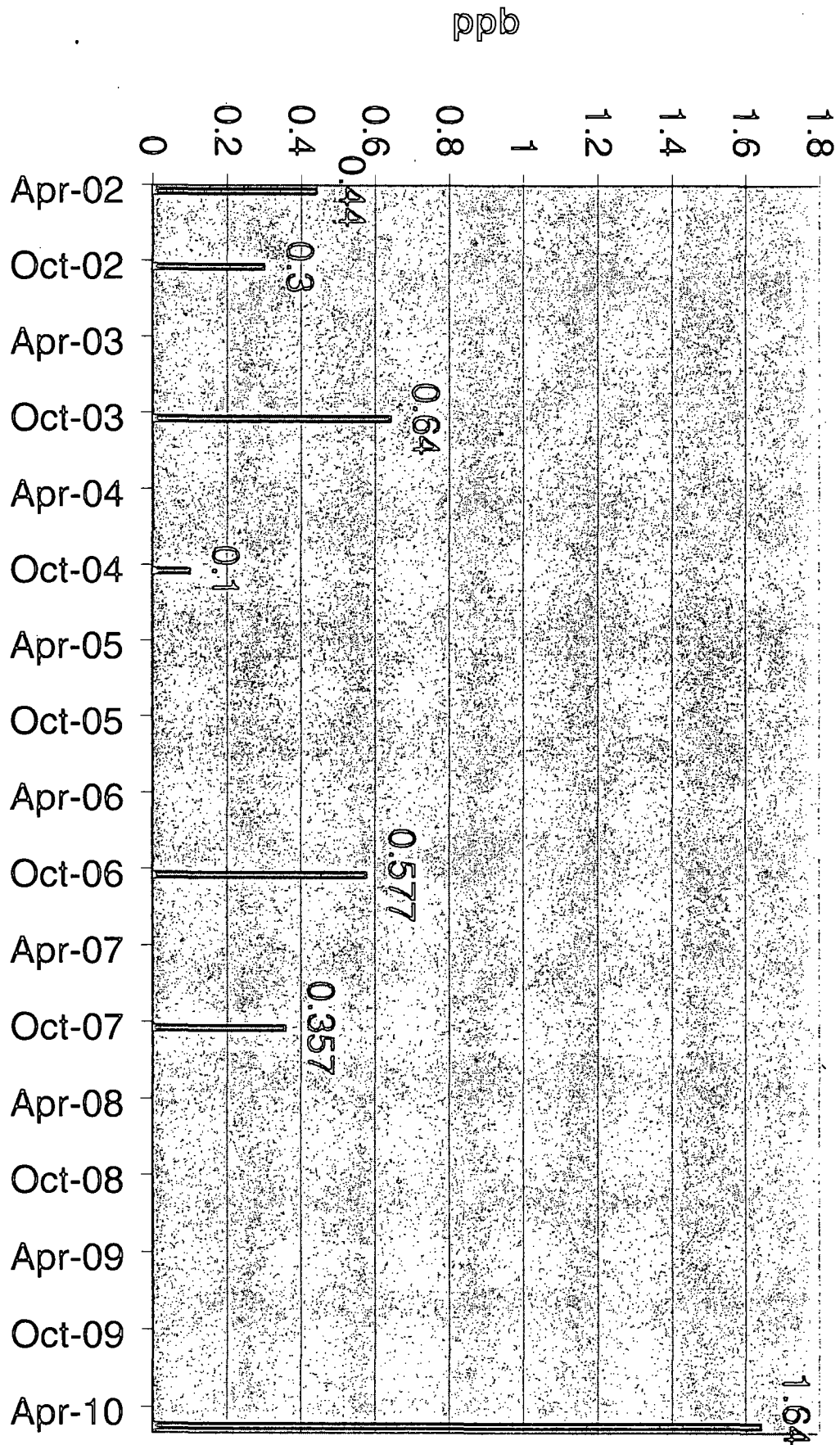
Mercury: HW West 2

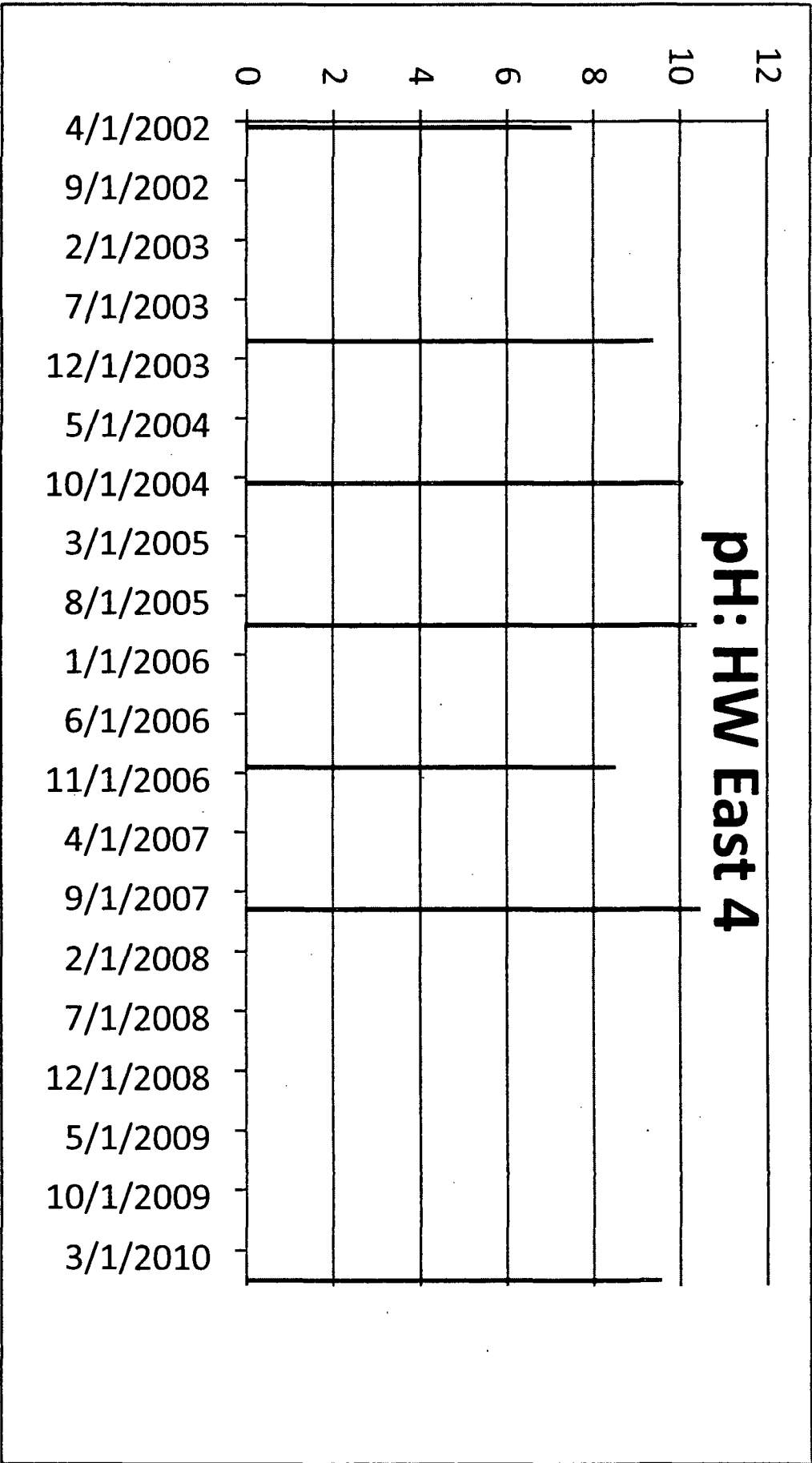


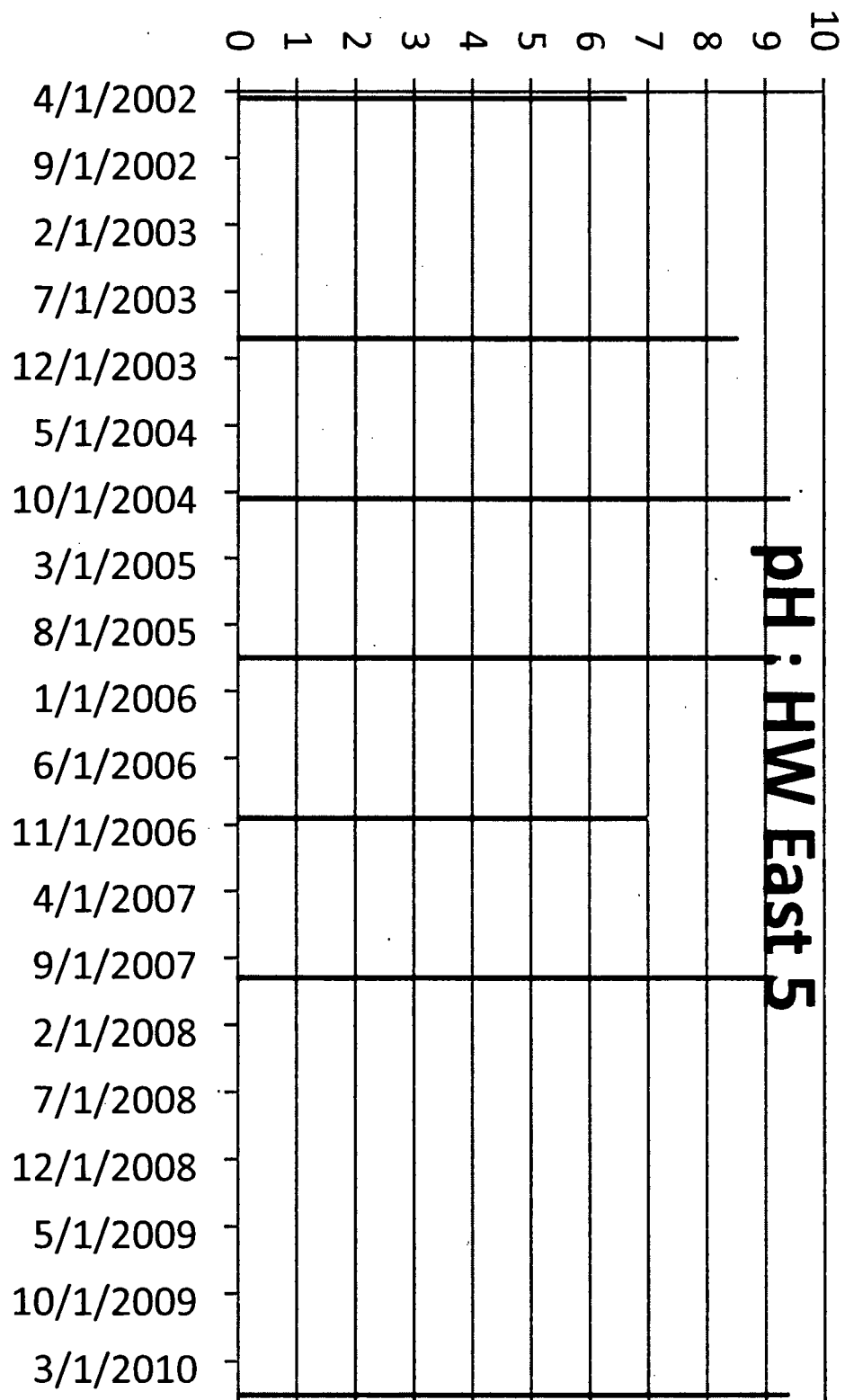
Mercury: HW West 3



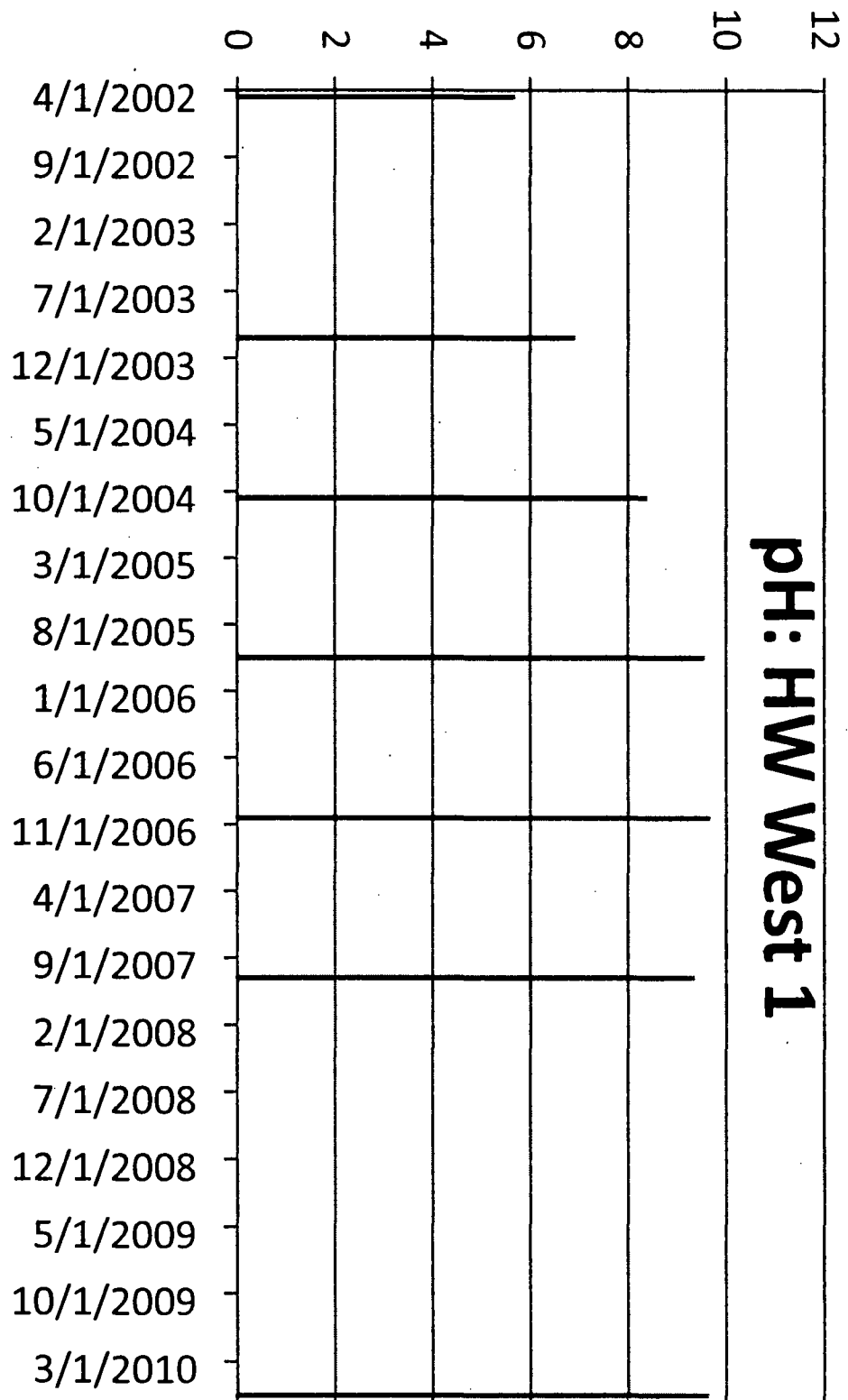
Mercury: HW West 4





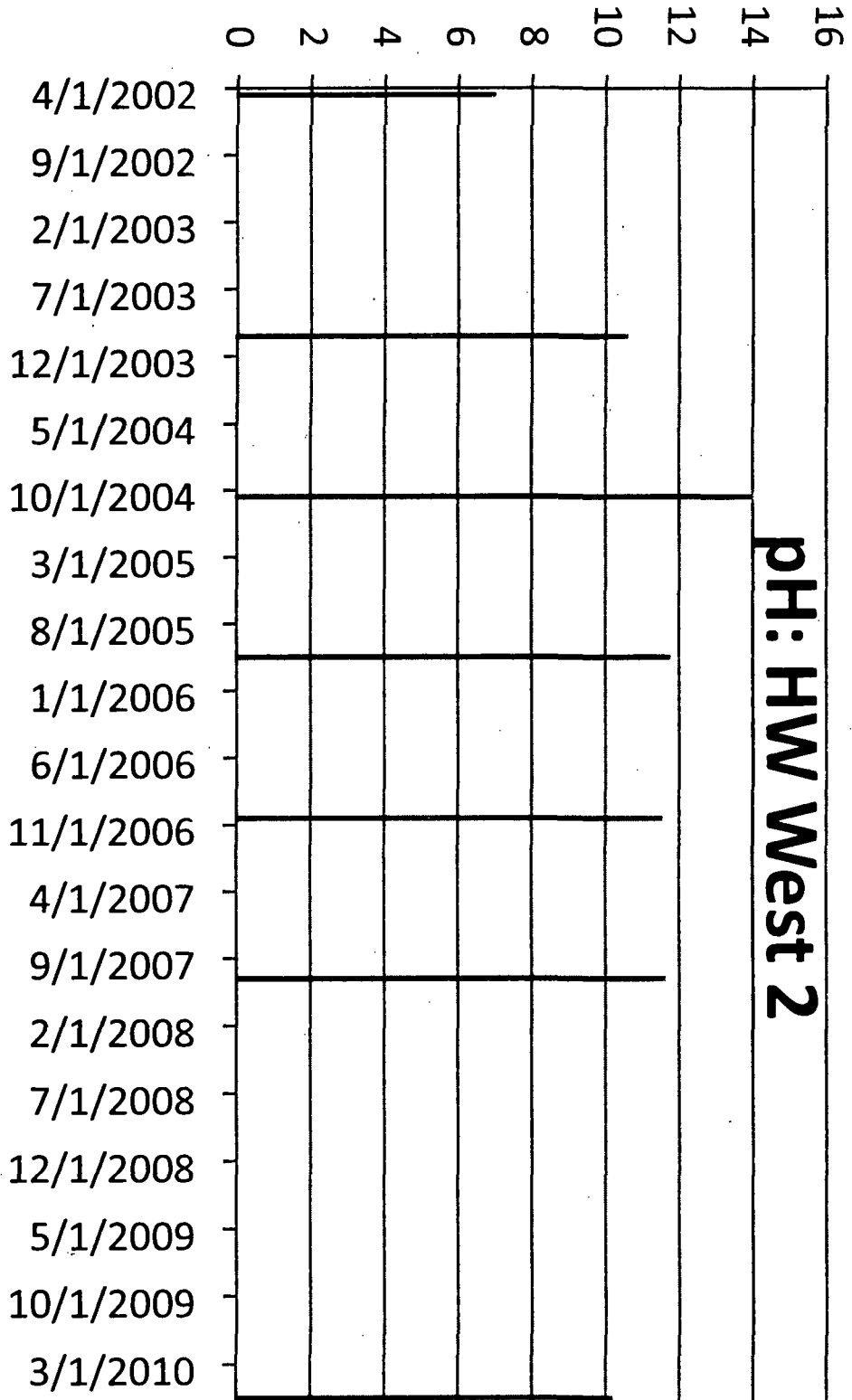


pH : HW East 5



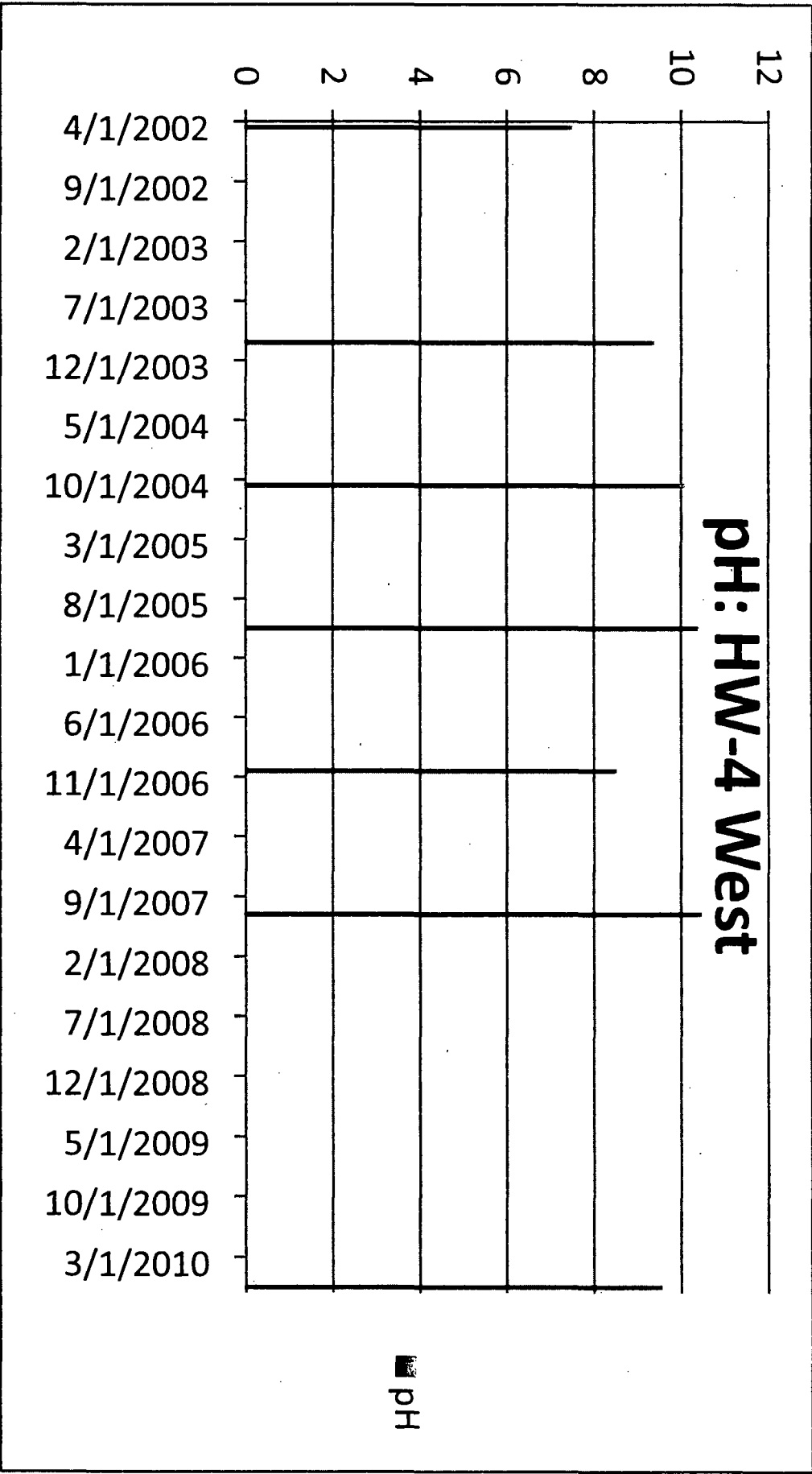
PH: HW West 1

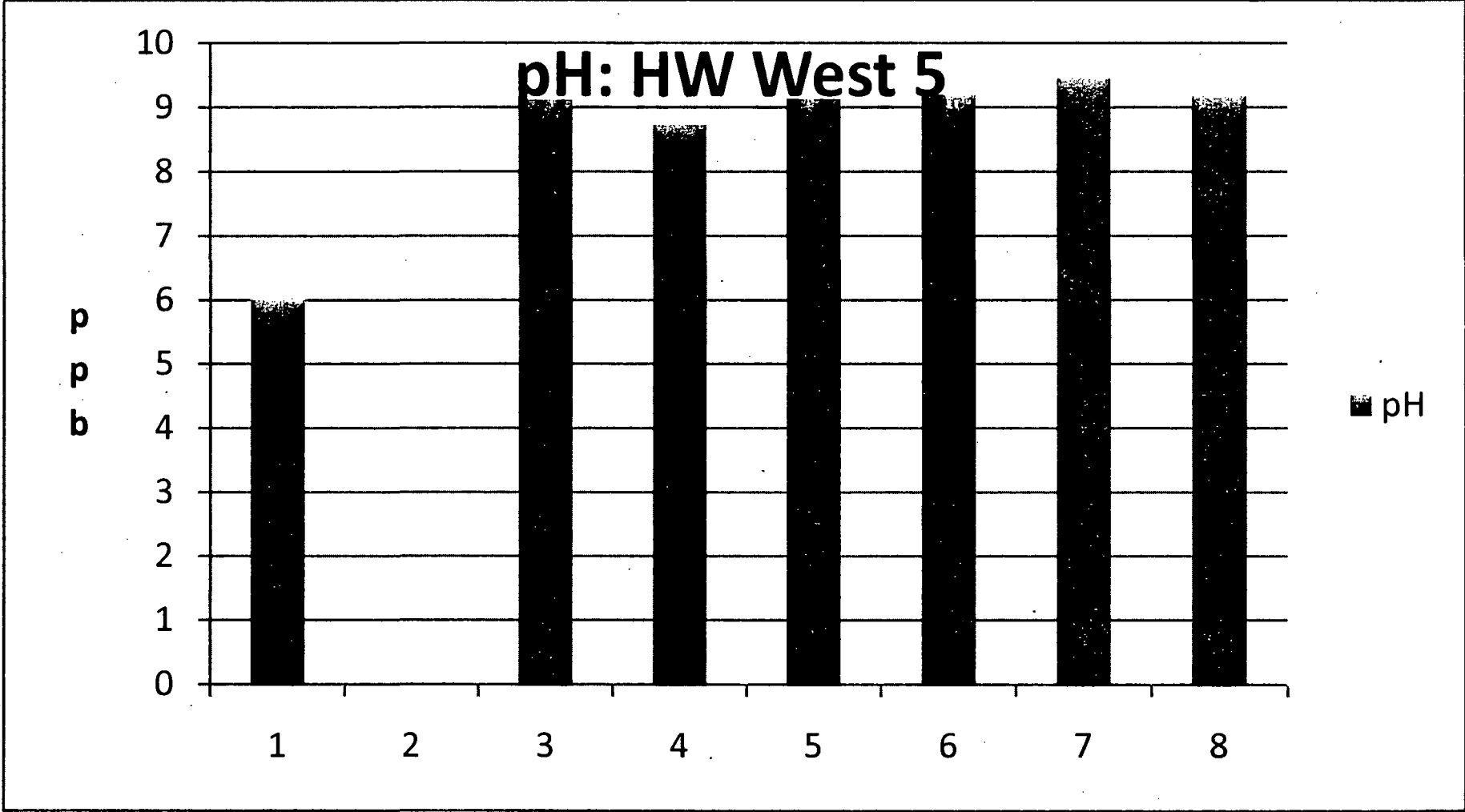
■ pH



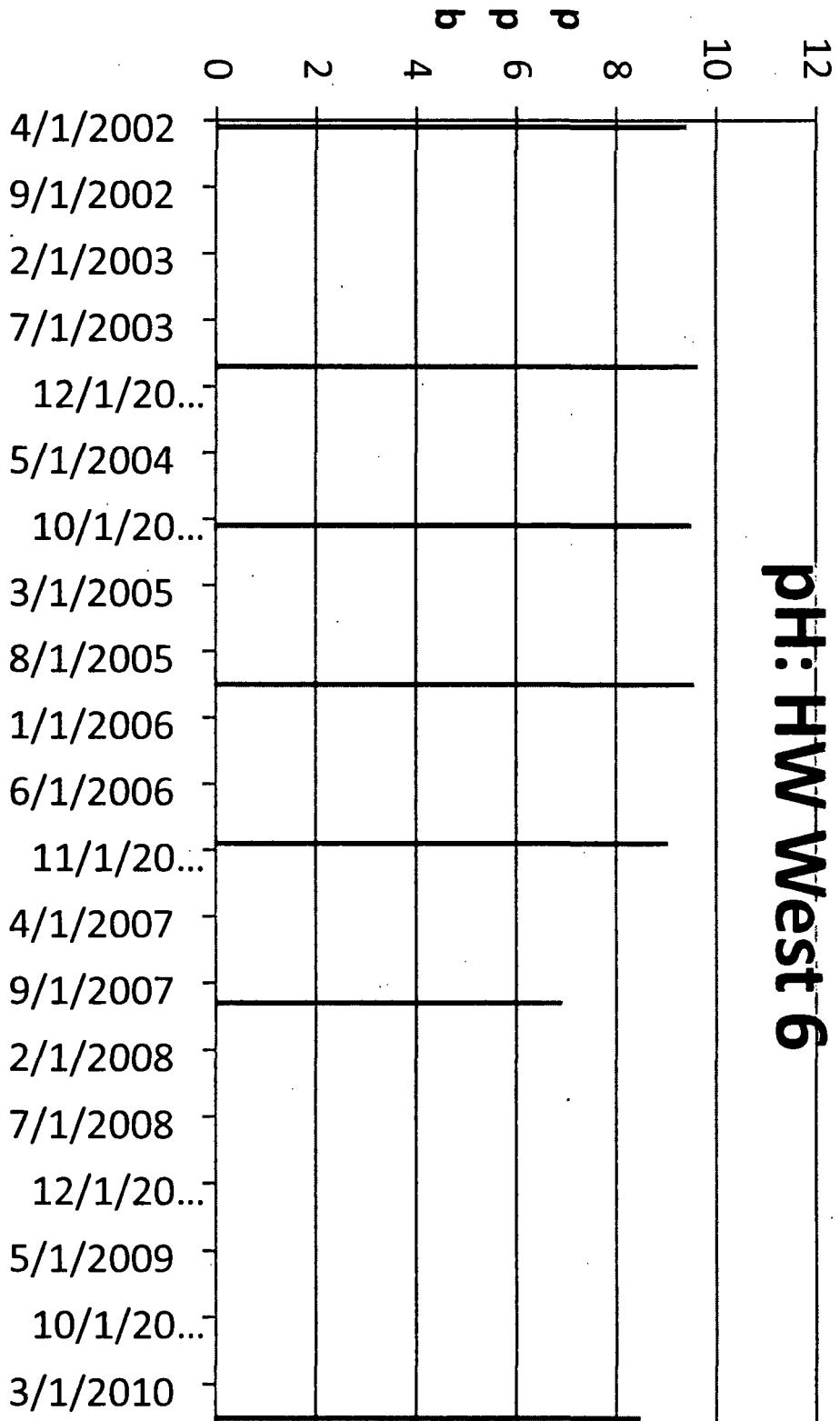
pH: HW West 2

■ pH



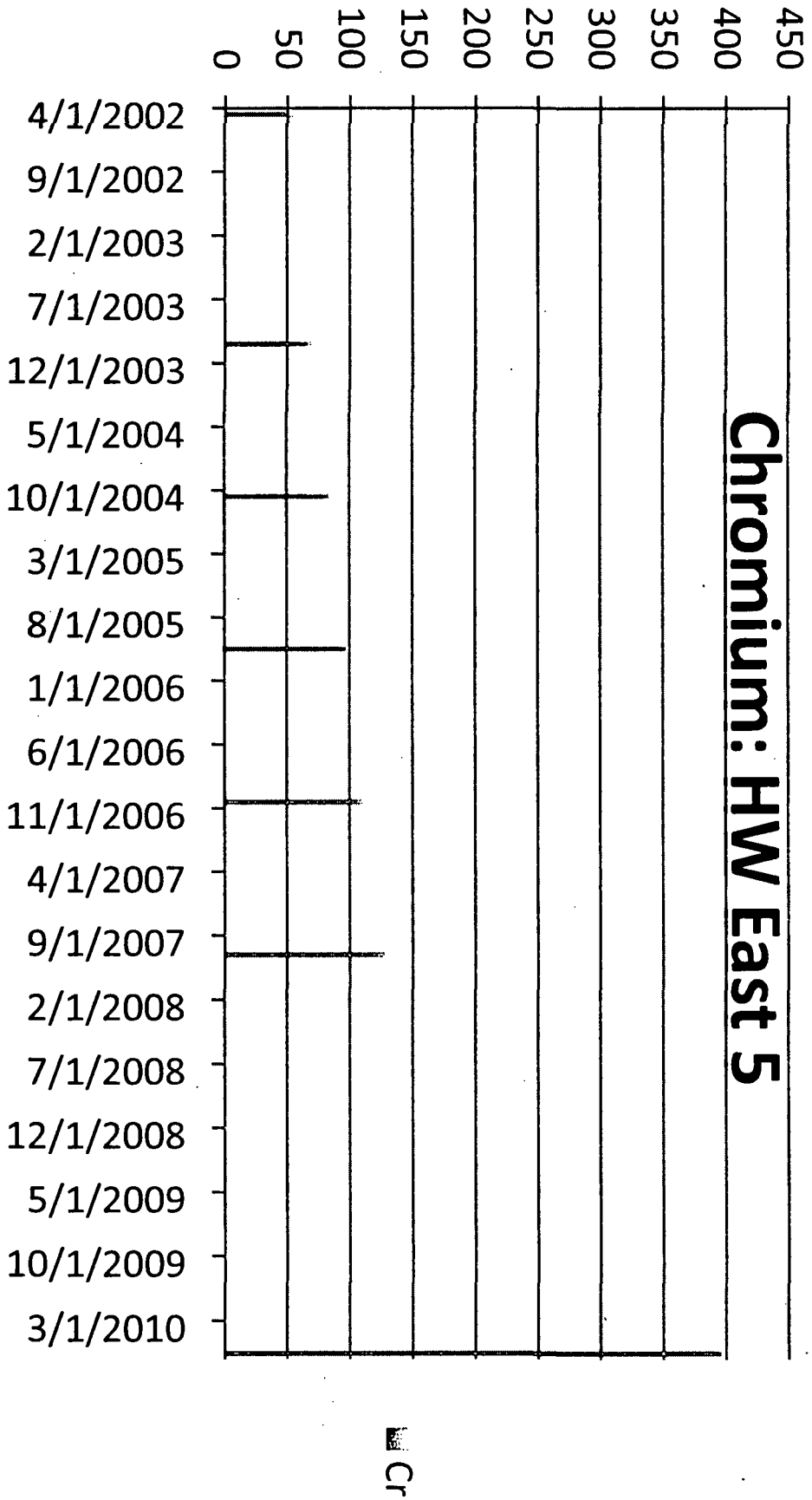


pH: HW West 6

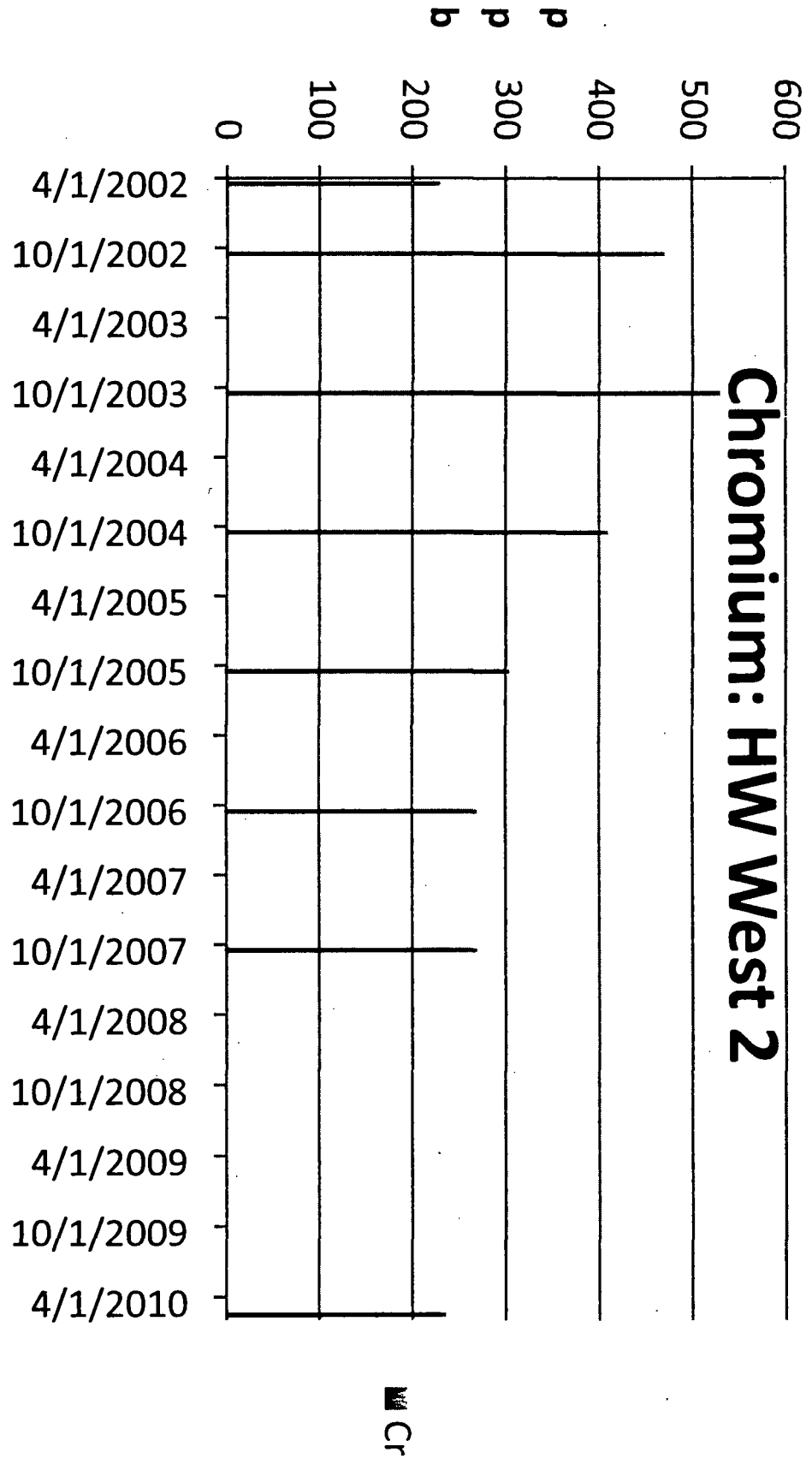


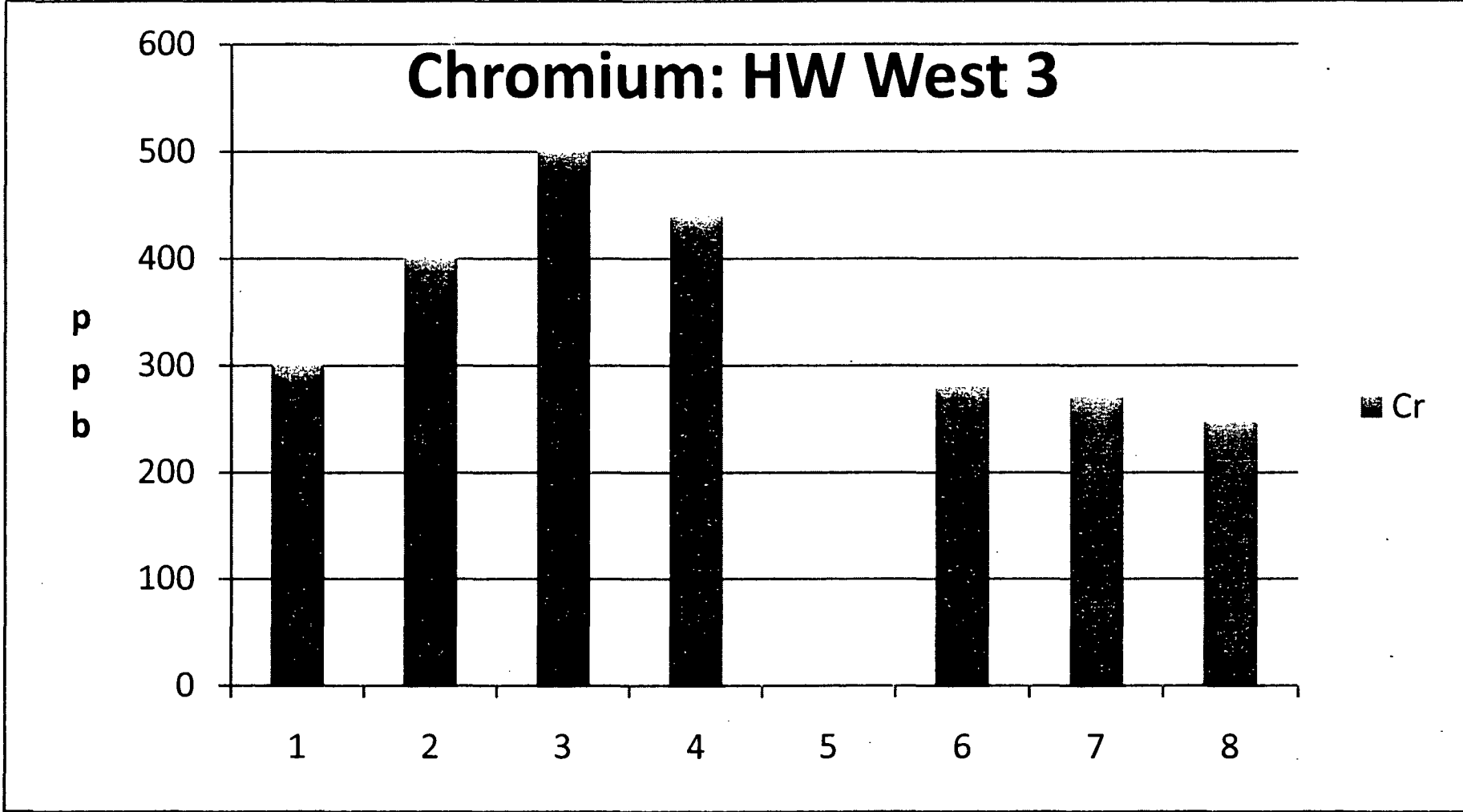
■ pH

Chromium: HW East 5

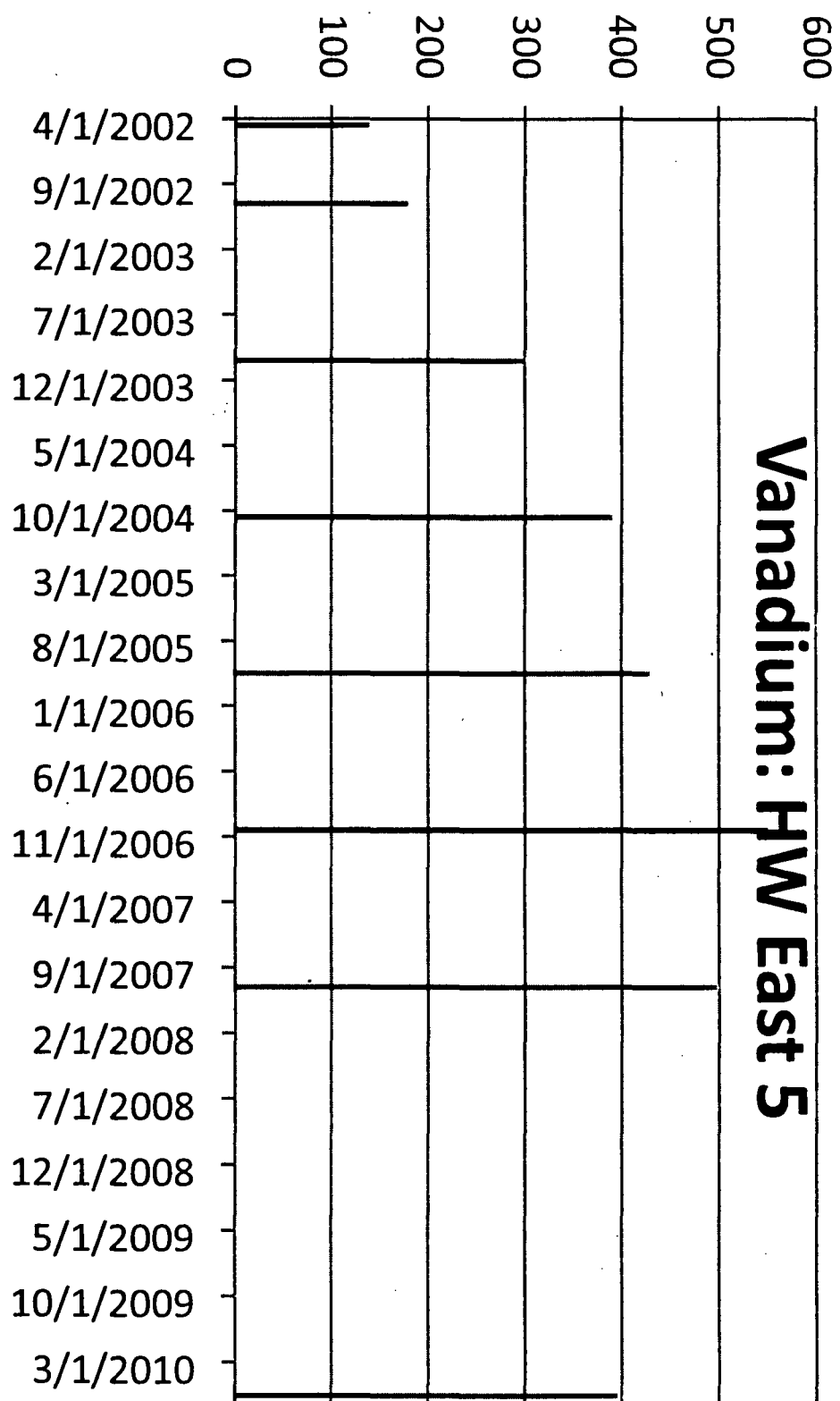


Chromium: HW West 2



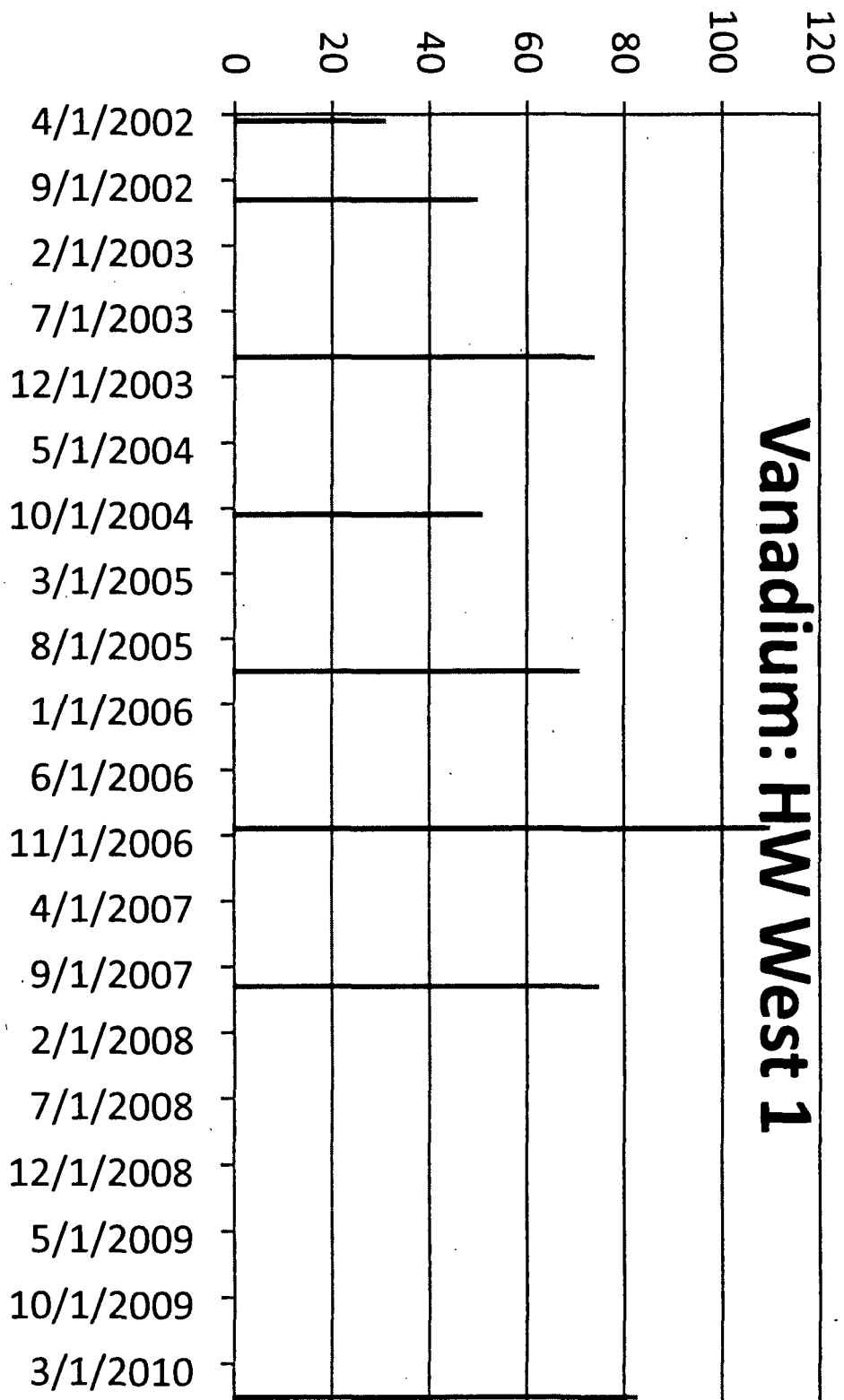


Vanadium: HW East 5



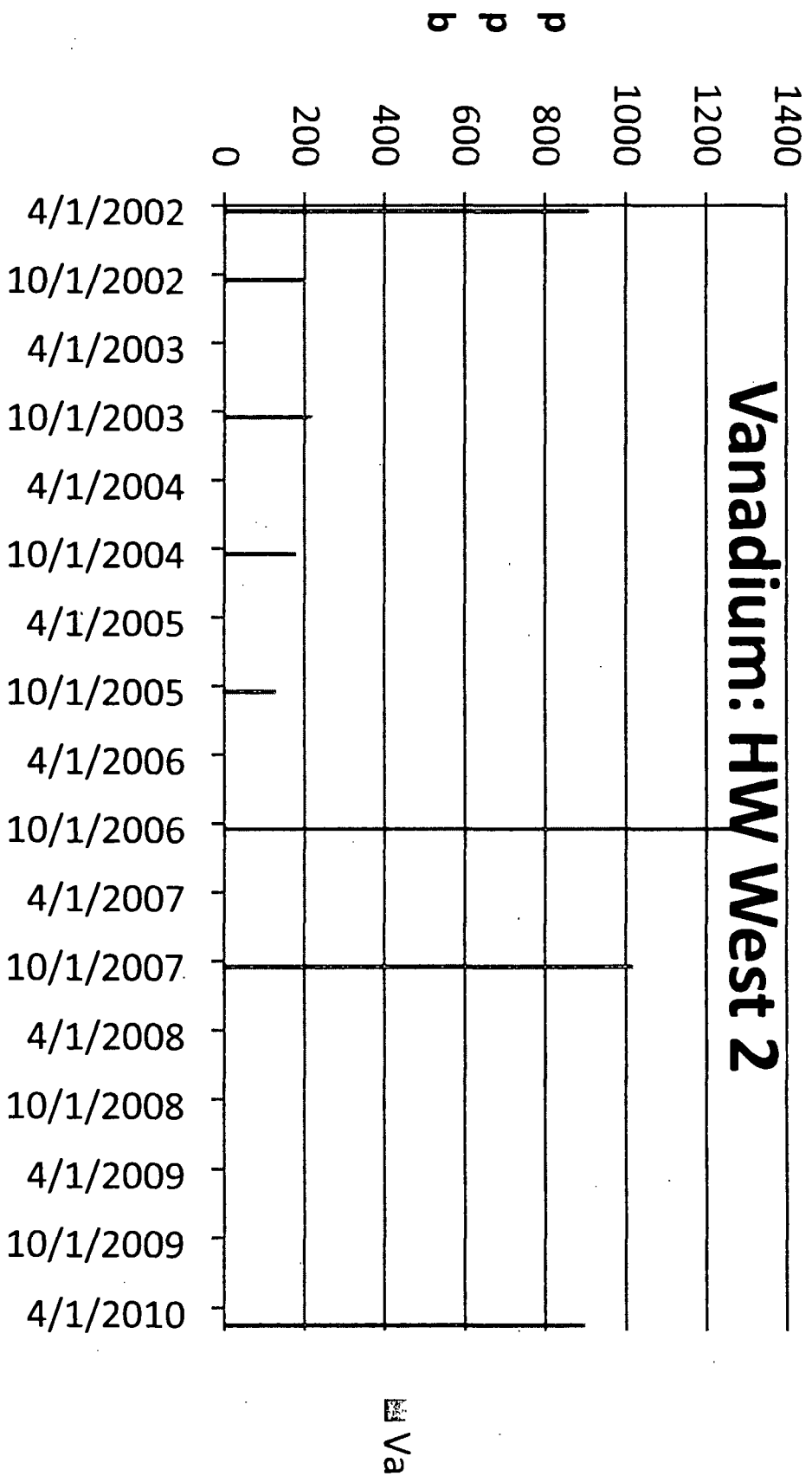
■ Va

Vanadium: HW West 1

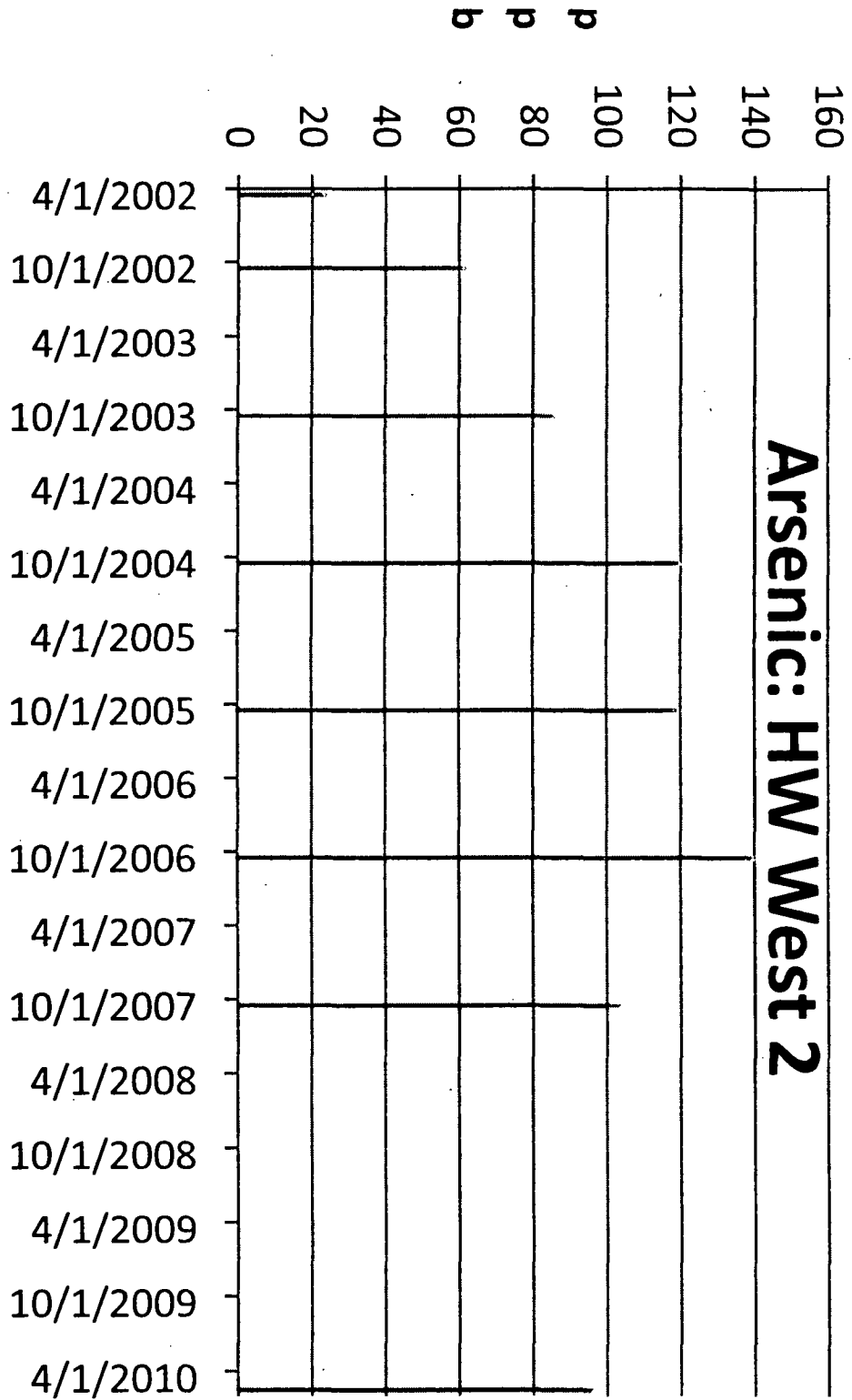


■ Va

Vanadium: HW West 2

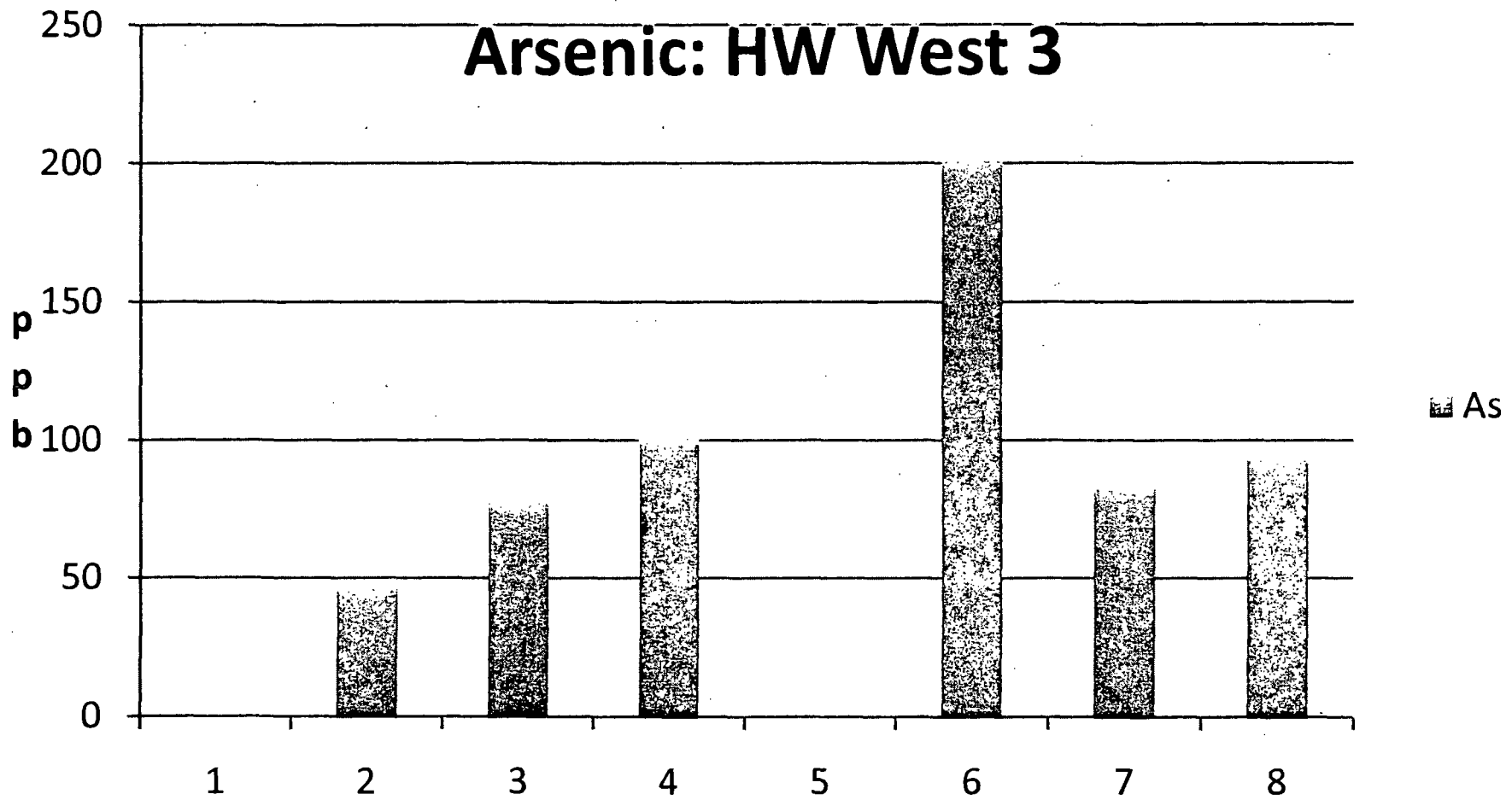


Arsenic: HW West 2



AS

Arsenic: HW West 3



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