Honeywell
P.O. Box 1057
Morristown, NJ 07962-1057

May 24, 2011

VIA EMAIL AND REGULAR MAIL

Mr. Galo Jackson
Remedial Project Manager
US EPA Region 4
61 Forsyth St. S.W.
Atlanta, Georgia 30303-8960

Re: EPA's Notice of Disapproval of December 2010 Draft of the Human Health Risk Assessment (HHRA) for the Estuary, Operable Unit 1 (OU1), Marsh Trespasser, Fish and Shellfish Consumer, Clapper Rail Consumer: LCP Chemical NPL Site, Brunswick, Georgia

Dear Mr. Jackson:

We are in receipt of EPA's letter dated May 17, 2011, transmitting the EPA's Notice of Disapproval of the OU1. The letter directs Honeywell to revise the previous draft of the OU1 HHRA as provided for in EPA's letter, within 21 calendar days of receipt of the letter (note that the closing paragraph specifies 15 days). We received the copy through certified mail on May 19, 2011, and have calculated a due date of June 9, 2011.

At the outset, we note that Honeywell understands and accept most of the comments set forth in EPA's letter. However, there are several items that need further clarification in order for Honeywell to comply with EPA's directive and make the requested changes in the document. We have provided a summary of these items below and, given the due date of June 9, 2011, request that we set up a (technical) conference call or meeting as soon as possible to discuss these items with EPA.

1. Section 4.4

The exposure frequency (EF) of six days per year mentioned in pages 9 and 11 of Section 4.4 for the marsh trespasser scenario must be revised, as previously directed. Although Honeywell may still support using a six-day-a-year frequency for the marsh trespasser, EPA stands by its conclusion that a 52-days- per-year EF for this scenario is appropriate.

Honeywell has argued that a six-day-a-year frequency for the marsh trespasser is reasonable because several of the areas where estuary soil and sediment were sampled contain soft, marshy ground that are very difficult for a human to repeatedly access and therefore chronic repeated exposure to these areas would not be expected. Based on this concern, EPA removed the samples collected from the soft sediment from the database used to calculate the exposure point concentrations (EPCs). The remaining data used to calculate the EPCs reflect samples which were taken in areas where human access would

not be severely hindered. Since this Site is adjacent to populated areas, in order to ensure that health risks to both current and future receptors posed by the Estuary are not underestimated, EPA has selected an EF of 52 days. Honeywell therefore needs to revise the risk assessment for all instances where the EF for this human visitor is discussed, used in a calculation, used in any presentation, used in a discussion of risks, or presented in text or tables. For example, in Section 4.4 on page 9 of the December 2010 version of the OUI HHRA, the paragraph that begins on line 13, which provides and discusses the exposure frequency for this site visitor, needs to be revised. Also see Table 7 in the December 2010 HHRA, which includes an exposure frequency of 365 day per year while an exposure frequency of six days per year is reported on Page 11 of Section 4.4.

Honeywell Question/Response: Honeywell used an EF of 6 days per year in the computational analysis (acknowledging that Table 7 – a non-computational table – erroneously showed a value of 365 day per year), as directed by EPA in their correspondence to Honeywell preceding the December 2010 draft revision. EPA implies that the EF of 52 days per year had previously been conveyed to Honeywell (with the statement "EPA stands by its conclusion"). However, this is first time this number has been conveyed to Honeywell in writing. Honeywell would like to understand the basis for the 52 days.

2. Tables 8a and 8b

As described in the footnotes to Tables 8a and 8b, the 0.6 factor should be applied only to the adult risk. The adjusted risk to the adult should be added to the full risk of the adolescent and the child. Review of the total risk on Tables 8a and 8b indicates that this was not applied. Revise the tables and text accordingly.

Honeywell Question/Response: Honeywell has checked the calculation worksheets used to create Tables 8a and 8b. Those worksheets show that Honeywell did use the 0.6 factor only for the adult risk computation, and that the risk from the three age categories had been correctly summed for the overall risk estimate. Thus, we do not understand EPA's comment and would like to discuss further.

3. Table 23

Although most of the RME cumulative hazard estimates were correct, with the exception of the marsh trespasser and child clapper rail consumer hazard estimates, all of the RME lifetime cancer risk estimates for the consumer-specific receptors were incorrect. The following discrepancies in the summation of the adult, adolescent, and child risk estimates (lifetime cancer risk) were noted between the draft HHRA values and those calculated by EPA. Revise the tables and Section 6.0 to reflect this change. All RGOs must be revised as necessary. It is recognized that the marsh trespasser lifetime risk will change, once the EF is changed.

Honeywell Response: Honeywell agrees the hazard estimate for the child clapper rail consumer was incorrect in the December 2010 HHBRA draft and requires correction; Honeywell notes that the hazard estimate for the marsh trespasser was correctly computed in the December 2010 HHBRA draft but will now change due to

EPA's new request for an EF of 52 days per year. As to the comments regarding the lifetime cancer risk estimates, Honeywell cannot reproduce the values shown by EPA in the embedded table accompanying this comment. Furthermore, Honeywell has confirmed that the cancer risk estimates were correctly computed in the December 2010 HHBRA draft. For the reasons set forth above, Honeywell would like to discuss further with EPA.

4. Table 24c

In Table 24c, include the RGO range estimates less than the EPC for the adolescent shellfish consumer. In addition, the cancer RGOs for EPA's target risk range should be shown in the table.

Honeywell Response: Section 7 of the December 2010 HHRA draft cites EPA Region 4 risk assessment guidance for the conditions that "trigger" the development of RGOs (i.e., an excess lifetime cancer risk that exceeds 1E-4 and a hazard index that exceeds 1.0) and summarizes the receptors for which RGOs are needed. The RGOS presented in Table 24c were developed consistent with the EPA guidance. RGO range estimates for the adolescent shellfish consumer because the hazard index (HI) this receptor was below 1.0. Similarly, no cancer based RGOs were provided for the shellfish consumer because the excess lifetime cancer risk estimate for this receptor was below 1E-4.

Please contact me at (973) 722-1656 to schedule a (technical) conference call or meeting to discuss the issues identified above.

Sincerely,

Prashant K. Gupta