

Georgia Department of Natural Resources Environmental Protection Division

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Judson H. Turner, Director

Land Protection Branch

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Phone: 404/656-7802 FAX: 404/651-9425

By USPS and E-mail

December 20, 2012

Mr. Galo Jackson
South Superfund Remedial Branch
USEPA Region IV
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-3104

Re: LCP Chemicals NPL Site, Remedial
Investigation (RI) for Upland Soils Operable
Unit 3 (OU3)

Dear Mr. Jackson:

The Georgia Environmental Protection Division (EPD) has reviewed the referenced document, dated November 2012, and makes the following comments:

- 1) Page 23, Section 6.2.3.2 – Dichloromethane (methylene chloride) was omitted from the list of COPCs in the table. This constituent has been identified as a COPC in Quadrant 3 of the HHBRA report and therefore should be indicated in the table as such.
- 2) Page 60, Section 8, second paragraph, second sentence, typo - "...as the cleanup *progressed* across the Site."
- 3) Page 60, Section 8, second paragraph, third sentence, typo - "...to direct clean surface water *runoff* away from..."
- 4) Page 60, Section 8, third paragraph, second sentence has no punctuation.
- 5) For each figure in Appendix C, the removal areas obstruct the view of the grids. Either show the removal areas some other way, or remove this layer completely from the figures.
- 6) In several areas of the text in Appendix C, there are references to grid numbers. Include a figure showing the number for each grid cell or a discussion in the text as to how the grid numbers were derived.
- 7) Page C-3, Methods, third sentence, typo – "...several different data *treatment* approaches..."
- 8) Page C-5, last paragraph, fourth sentence, insert a comma after 5, as in, "Under Scenario 5, which uses the ..."
- 9) Page C-6, first full paragraph, the last sentence is actually two complete sentences. Please revise.
- 10) Page C-6, third full paragraph, third sentence, typo – "...grid cells are not *contiguous*."

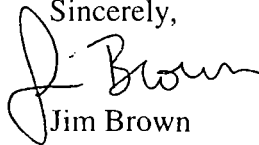


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11) Page D-3, Table D-1, Quadrant 3, typo – “1,2,4-Trimethylbenzene”

Please have the RPs address the above comments in the next revision of the RI. You may contact Allison Keefer or Shanna Alexander, of my staff, at (404) 656-7802 if there are any questions regarding this matter.

Sincerely,

A handwritten signature in black ink that reads "Jim Brown". The signature is written in a cursive style with a large initial "J" and "B".

Jim Brown
Program Manager
Corrective Action Program