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November 1, 2018

VIA ELECTRONIC MAIL

Galo Jackson
Remedial Project Manager
Restoration and Construction Section, Restoration and Sustainability Branch
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: LCP Chemicals Superfund Site, Brunswick, GA
Civil Action No. 2:16-cv-00112
Pilot Study 6 Month Screening Summary

Dear Mr. Jackson:

Following completion of the initial Thin Cover Placement Pilot Study within the LCP Chemicals site marsh system in March 2018, we have performed the initial 6-month screening evaluation as outlined in the EPA-approved Pilot Study Work Plan ("PSWP"). Attached is a series of summary images illustrating the current conditions within the pilot area at the time of the survey. In addition to providing the attached slide deck, we note the following for your consideration:

- The thin cover installation was completed on March 22, 2018. The aerial imagery in the attachment that depicts the pilot study area immediately following construction was collected on March 23, 2018. Progress within the pilot study area was assessed by remote aerial imagery performed by unmanned aerial vehicle ("UAV") flights and visual inspection from land performed on September 26 and 27, 2018.
- At the time of inspection in September, no significant changes were observed in the placed materials. Material appeared to be stable, with no erosion or material loss noted. However, as was described in the PSWP, natural recolonization is expected to occur over several growing seasons. Also, while no vegetative recovery was expected at this initial timeframe, recovery trends appear strongest along the east portion of the pilot area, in locations where cover material application was well dispersed, with reduced energy, resulting in lower initial stress to existing vegetation.
- Further, we wanted to highlight to EPA that the 6-month post-construction aerial imagery was collected following the passage of Hurricane Florence in early September. We did not identify any observable damage or impact associated with the storm, as the placed materials appeared stable.

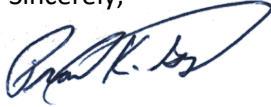
We also made landside observations from the causeway following Hurricane Michael in early October and did not identify any observable effects from that storm as well.

In addition to the above, we would like to provide some notes on the attached slide deck:

- Slide 3 – Elevations and contours shown are pre-construction conditions.
- Slide 4 – Imagery was collected prior to removal of tracer plot boards. Ponded water in the center of the area occurred as a result of localized compression due to equipment loading.
- Slide 6 – Depicts view looking west. The sand cover quadrant is to the left in images and fine-grained material to the right. Limited small patches of plant recovery are observable.
- Slide 8 – Approximate tracer plot location illustrated for comparison; no evidence of preferential scour or material loss observed. Reduced impact to vegetation during placement observable in the March 2018 imagery, resulting in stronger vegetation recovery by September 2018. Drainage channel in lower right corner re-established naturally following material placement.
- Slide 9 – Orthogonal imagery comparison of similar area as Slide 6 oblique imagery; approximate tracer plot location illustrated for comparison.
- Slide 10 – Depicts view looking west along mat access road alignment. Compression from loading resulted in ponded water along the alignment; minimal vegetative recovery to-date, but warrants longer-term monitoring to assess trends.

The next monitoring event will occur at the 12 month post construction period in March of 2019 and will include aerial imagery, habitat assessment, and sediment chemistry sampling. Please let us know if you have any questions.

Sincerely,



Prashant Gupta
Project Coordinator

Enclosure

cc: Rich Galloway, Honeywell
Adam Sowatzka, King & Spalding, LLP
Ram Mohan, Anchor QEA
Mark Reemts, Anchor QEA
Randy Brown, Anchor QEA



Thin Cover Pilot Study 6-Month Inspection Summary

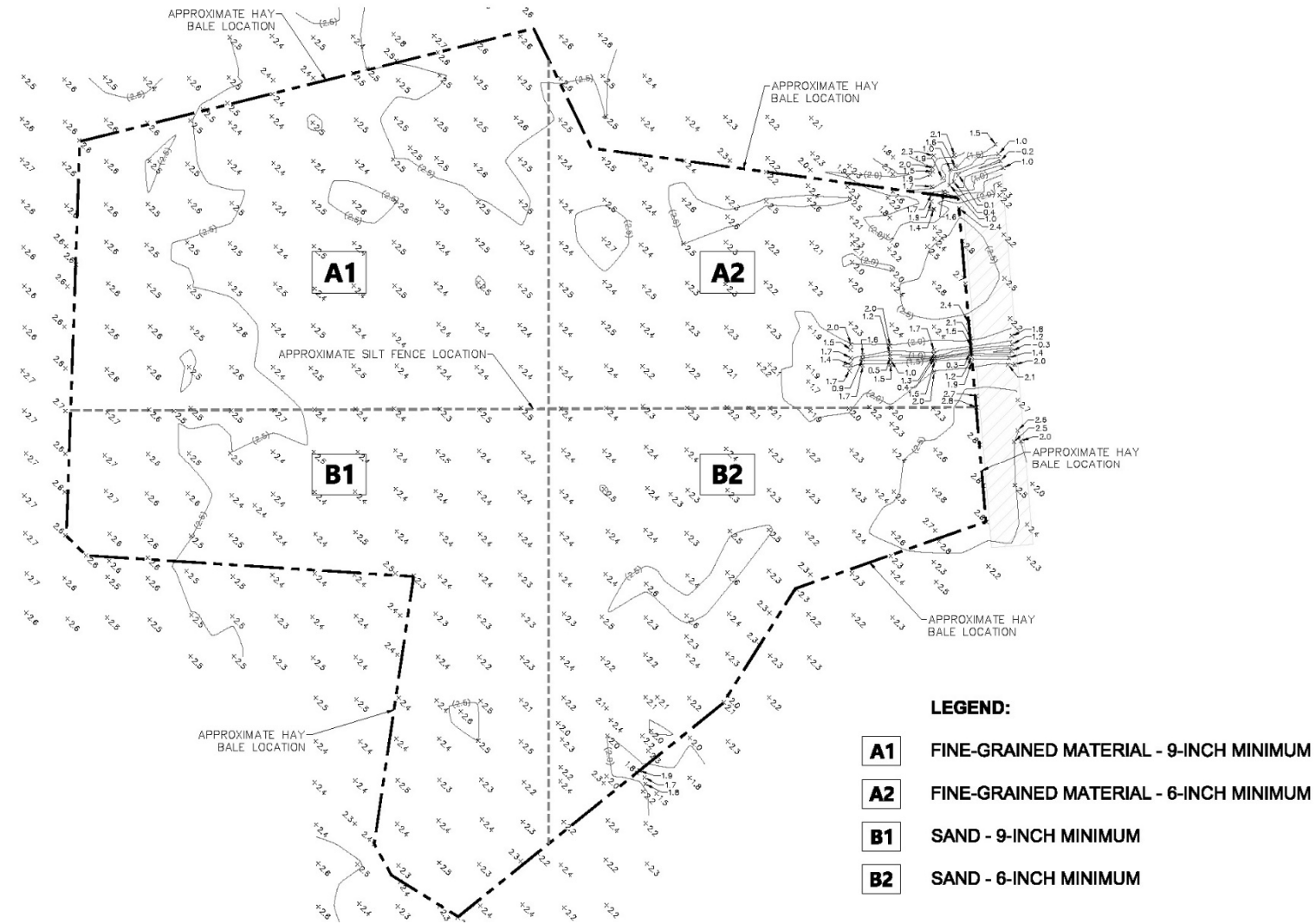
September 2018



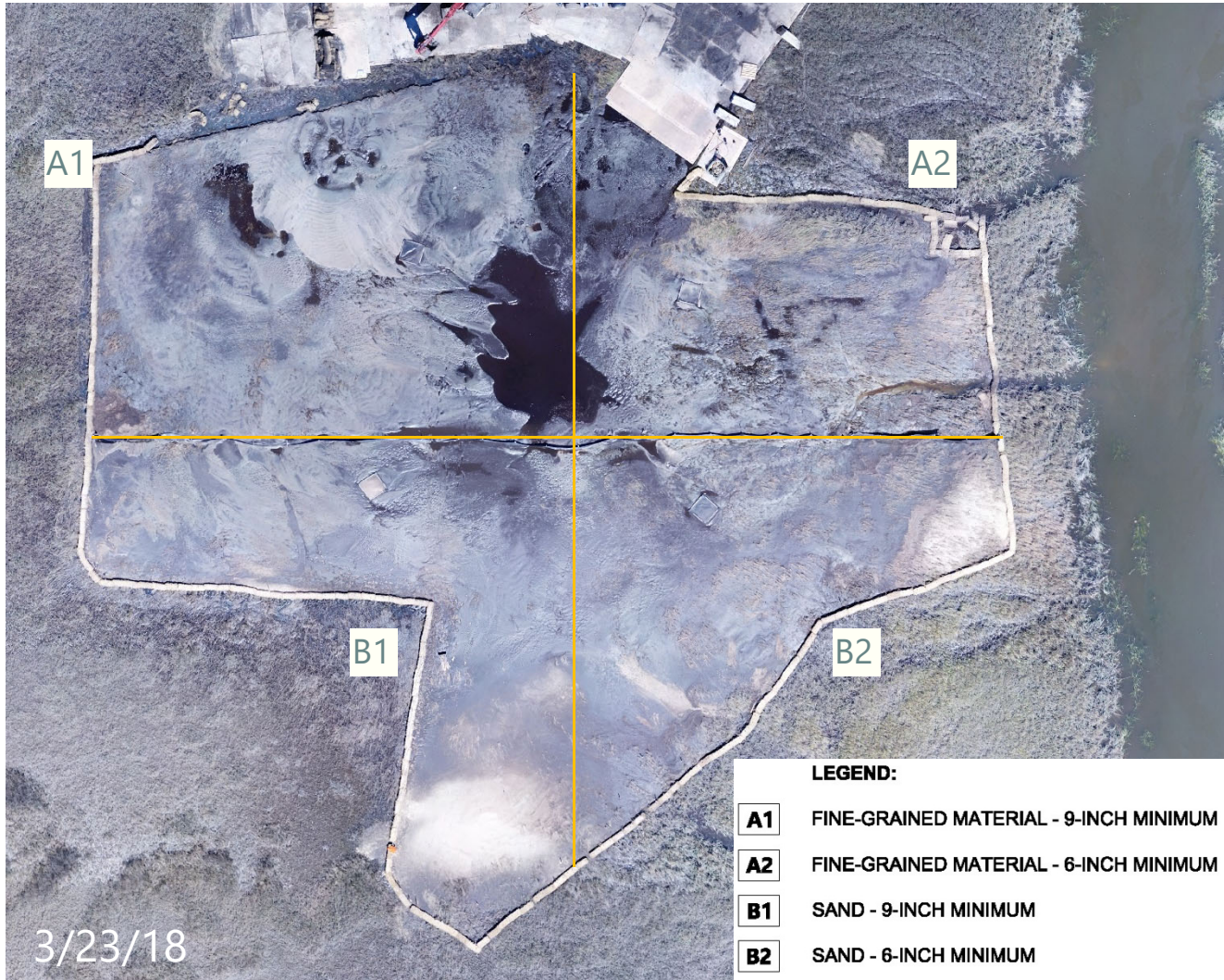
General Site Overview



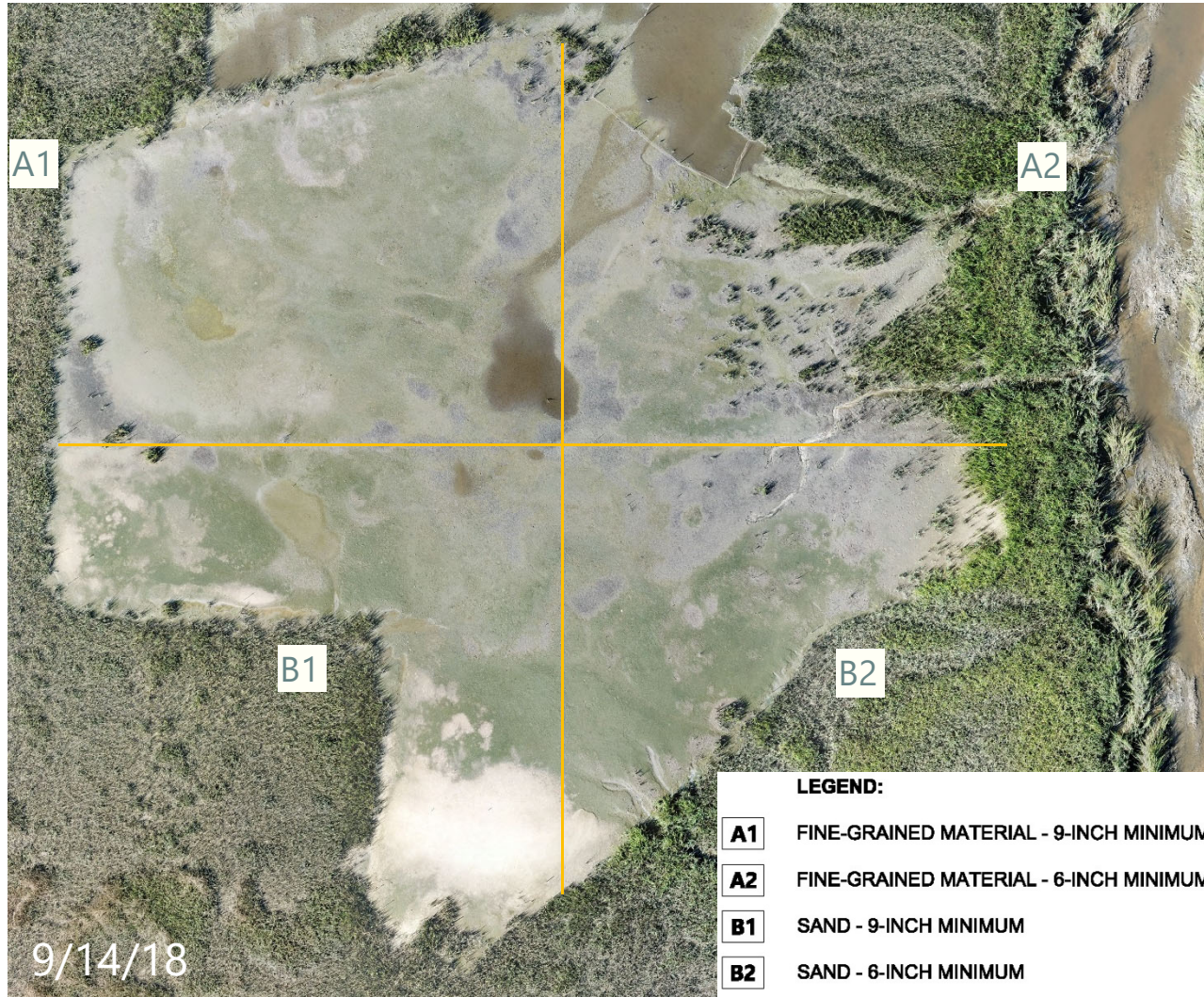
Thin Cover, Construction Plan



Thin Cover, Immediately Following Construction



Thin Cover, 6 Months Post-Construction



Quadrant A1 & B1

9-Inch Cover, Sand and Fine-Grained Materials



March 2018



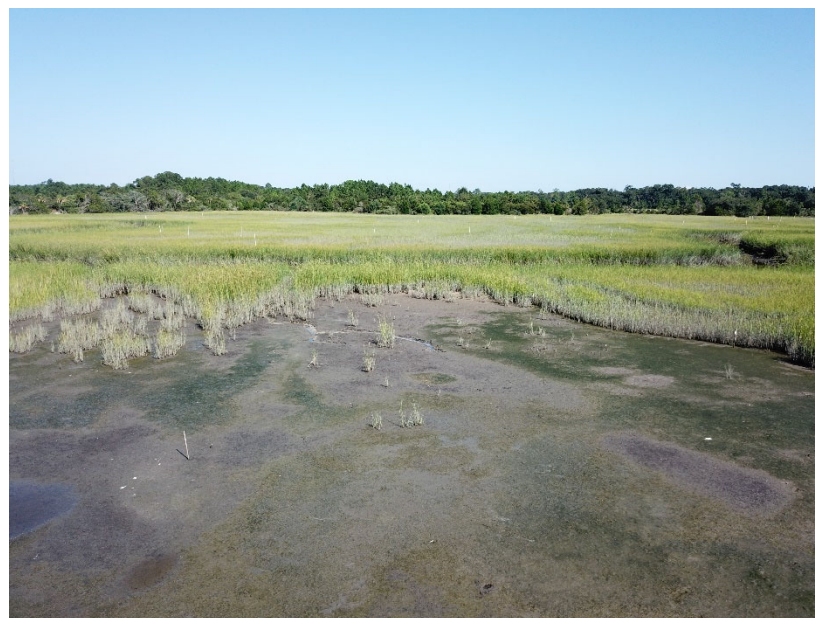
September 2018

(view looking west)

Quadrant B2 6-Inch Cover, Sand



March 2018



September 2018

(view looking east)

Quadrant A2

6-Inch Cover, Fine-Grained Material



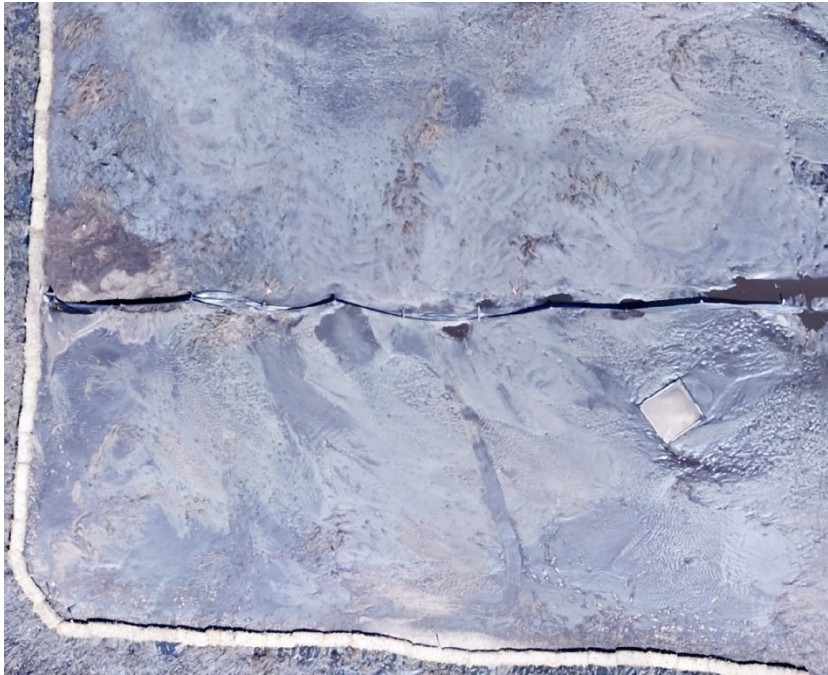
March 2018



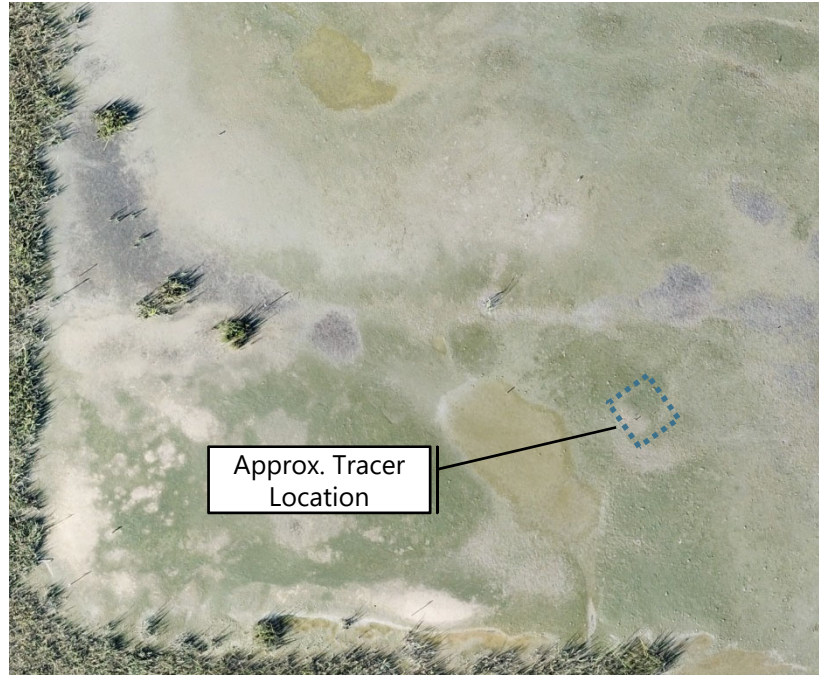
September 2018

Quadrant B1

9-Inch Cover, Sand and Fine-Grained Material



March 2018

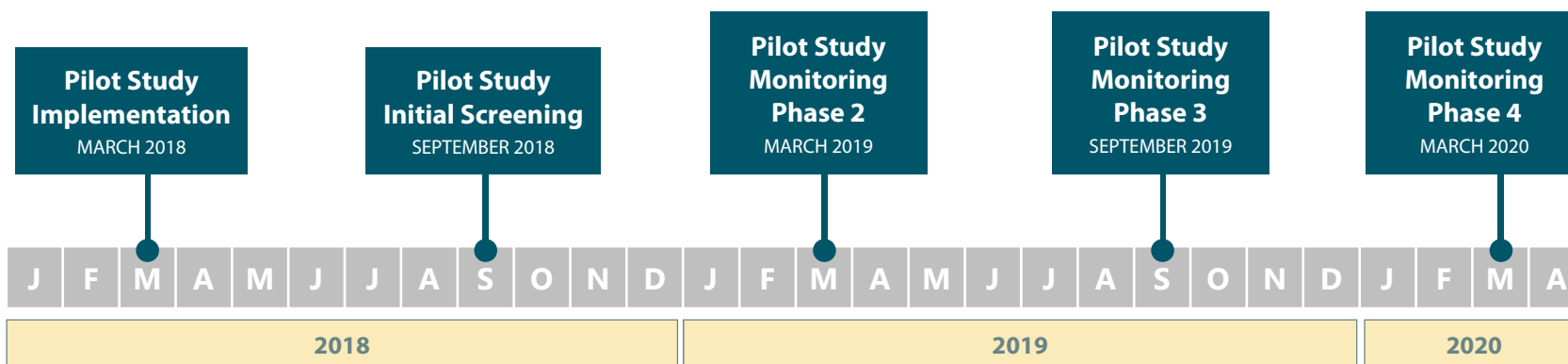


September 2018

Former HDPE Mat Roadway



Pilot Monitoring Timeline



Event	Period	Aerial Imagery	Habitat Assessment	Sediment Chemistry
Initial Screening	6 Months	X		
Phase 2	12 Months	X	X	X
Phase 3	18 Months	X	X	
Phase 4	24 Months	X	X	X