MAIL TO:

Pam Scully

US EPA Region 4

61 Forsyth Street, SW, 11th Floor

Atlanta, GA 30303-3104

RE: LCP Chemicals Superfund Site - Uplands Proposed Plan

[INSERT TODAYS DATE]

Dear Pam Scully,

My name is [INSERT FULL FIRST AND LAST NAME] and I reside at [INSERT FULL MAILING ADDRESS]. [Please include a short statement as to why this cleanup is important to you].

The purpose of this email is to comment on the United States Environmental Protection Agency’s (EPA) Proposed Plan for the LCP Chemicals Superfund Site Uplands area (also referred to as Operable Unit 3) located in Brunswick, GA.

At this time, I understand that the EPA has proposed ‘no further action’ in the uplands area of this site as the preferred remedy. This Plan is unusual in that no other remedial alternatives were presented for our community to consider. The EPA has requested for our community to submit comments on a preferred remedy, however, in this case only one remedy has been presented.

* Did the EPA consider additional removal of soil contamination, containment of residual soil contamination under engineered barriers, or any other possible alternatives to prevent potential risks to human health and the environment in the future?
  + If yes, why was only one alternative presented to our community? What were the other alternatives considered to address the residual contamination and provide more certainty for preventing future exposures? Why were those alternatives not presented to the community in this Proposed Plan?
  + If not, can the EPA consider additional alternatives to prevent potential risks to human health and the environment in the future and present those to our community for consideration?

Human-health risk assessments completed by the EPA and the Agency for Toxic Substances and Disease Registry (ATSDR) produced different results. The EPA concluded that though the human health risk assessment shows residual soil contamination, it presents no unacceptable risks to future site workers. However, the ATSDR determined that, in some areas, residual contamination could cause unacceptable risks. Specifically, ATSDR reported that four (4) parcels contain residual soil contamination that could harm future commercial and/or industrial workers. Furthermore, the ATSDR recommended that “some areas of the LCP Chemicals Site should not be developed for commercial or industrial use unless further steps are taken to prevent exposure to residual PCB, mercury, and PAH contamination that remains in the soil on the property.” Due to the uncertainty of future development of the property, the residual contamination should be addressed in this proposed plan.

* How does the EPA justify ‘no further action’ when the ATSDR − the federal agency who is responsible for protecting communities from harmful health effects related to exposure to natural and man-made hazardous substances − recommends that these areas should not be developed for commercial or industrial uses unless further steps are taken?
* How can the EPA ensure that an industrial worker will not be exposed to residual contaminated soil when the future use of this site has not yet determined?
* Is the EPA assuming that future development of this site will not lead to exposure to future commercial or industrial workers?

To summarize: only one alternative has been presented to our community being ‘No Further Action’; there are apparent differences in the risk assessments completed by two federal agencies; and, residual contamination exists in the upland soils that could be exposed to commercial and industrial workers. Without additional alternatives to consider, responses to the above questions, and further justification from the EPA, there is not enough information known at this time to move forward with this preferred remedy.

Thank you for your attention to our comments, questions, and concerns.

Sincerely,

[First and Last Name]

[Mailing Address]

[City, State, Zip Code]