Glynn County Superfund Sites
LCP Chemicals Superfund Site:
Estuary Proposed Plan Information Bulletin
January 2015

Site Background

The LCP Chemicals Superfund Site consists of approximately 550 acres, the majority of which is a tidal marsh. For about 70 years, various manufacturing industries operated at the site. These industries contaminated the site with mercury, lead, polychlorinated biphenyls (PCBs), and other toxic chemicals. These contaminants impact the site's soil, ground water, tidal marsh sediment and marsh biota. The LCP Chemicals site is currently occupied with process buildings, an administration office and a caustic brine treatment plant. The site cleanup is being managed in three parts, which are the estuary, the groundwater, and the upland soils and sediments.

Aerial view of LCP Chemicals Site—Photo: James Holland

The Estuary Proposed Plan

This information bulletin addresses issues concerning the EPA Proposed Plan (Plan) for the LCP Chemicals Superfund Site in Glynn County Georgia. In Late November 2014, days before Thanksgiving, EPA released the Proposed Plan for cleanup of this site on the Turtle River. The Plan was based on a Remedial Investigation (RI) and Feasibility Study (FS) that was released in final form along with the Plan. The site was used for several industrial purposes, most recently, for a chlor-alkali facility that left various toxic chemicals, including mercury and PCBs as contaminants.

To summarize, the Plan has the following elements:

- Removal of contaminated sediment and creek bank
- Capping of contaminated sediments with fully engineered capping materials
- Covering salt marsh with a thin layer of clean materials.
- Permitting the natural sedimentation processes to cover contamination
- Continued restrictions on fish consumption to control the behavior of people using the site, referred to as Institutional Controls

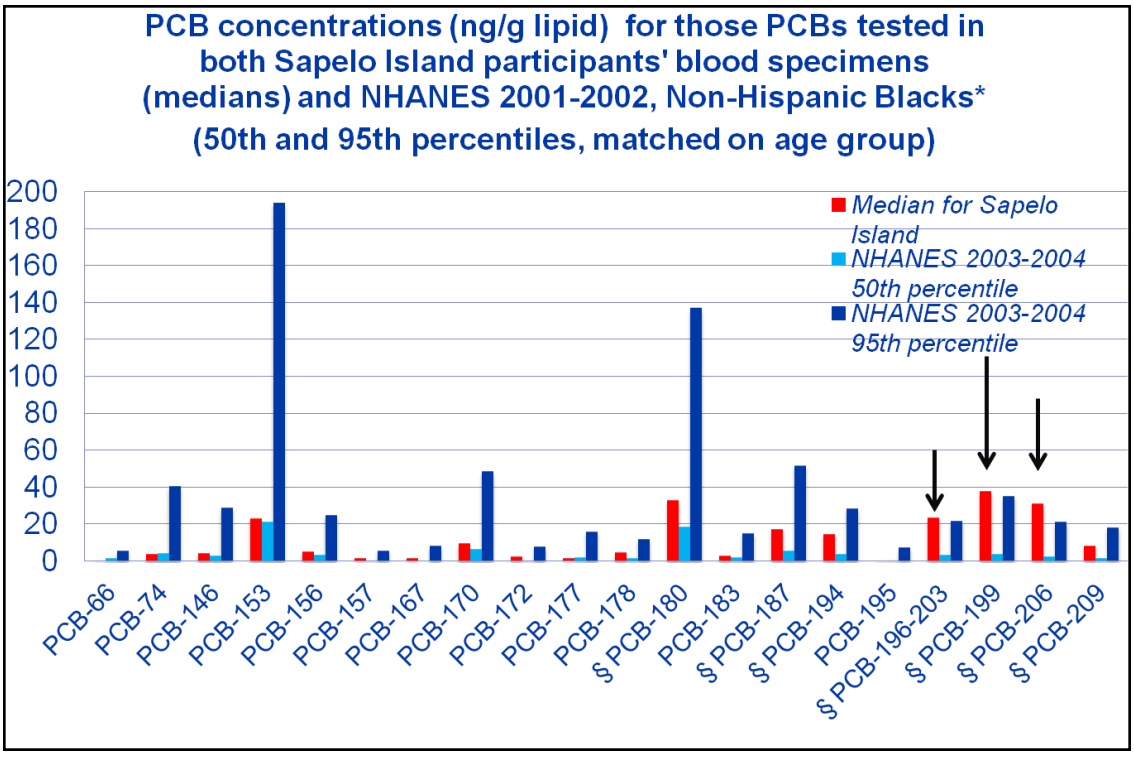
The following items in the Proposed Plan for the cleanup of the Estuary LCP site raise concerns:

- There needs to be more sediment removal, compared to capping and thin-cover placement, because sediment removal is a more effective and permanent cleanup option.
- A re-planting program of *Spartina* (a salt marsh grass) post-remediation should be one of the first monitoring efforts to help speed up ecosystem recovery.
- The evaluation of the way the LCP site is used by community members is inaccurate.
- Atlantic bottlenose dolphins are an essential part of the local ecosystem and are not included in the ecological risk assessment for the site.
- Thin-cover placement, or enhanced natural recovery, is not a sustainable recovery method.
- The Human Health Risk Assessment does not accurately present true health risks.

More Issues with the Estuary Proposed Plan

- Institutional Controls to restrict the consumption of contaminated fish are ineffective and fail to achieve the stated objective, according to national data (www.gao.gov/cgi-bin/getrpt?GAO-05-163).
- Covering contaminated sediment with an engineered cap, especially near the tidal creek, will fail when the creek shifts its course, as happens with tidal salt marsh creeks.
- Covering with a thin layer of "clean" material has no good track record in this type of system with eight foot tides and sea level rise due to global warming.
- The Plan relies on fish consumption information that is out-dated at best and fails to gather data on local African-American residents fishing and consumption.
- EPA would not use the data on contaminants in Turtle River fish because the way in which the fish were sampled did not meet EPA specifications, yet the same data was used by the state of Georgia to advise the fish consumption advisory.
- Data on PCBs (as Aroclor 1268) in the blood of residents from Sapelo Island, 25 miles away, clearly shows that PCBs in residents' blood are the same as used in the LCP facility with no other source identified. Aroclor 1268 was only little used in other applications, according to ATSDR (Toxic Profile). This result indicates that the site boundaries have yet to be accurately delineated.
- Modern methods of sediment removal can operate in this type of system with minimal resuspension of materials.

Sapelo Island Study: Blood Results



When the results of the blood tests were compared to samples from non-Hispanic African Americans throughout the country, some of the PCB levels in blood of the Sapelo Island residents were above the 95th percentile. In addition, when the Sapelo residents' samples were compared to the samples from local Atlantic bottlenose dolphins, scientists found that the human and dolphin samples contained similar environmental contaminants. This shows that contaminants from the LCP Chemicals Site have migrated into the waters and sediment surrounding Sapelo Island, into the local seafood, and finally, into the bodies of local residents who eat the local seafood. A copy of the presentation can be found on the GEC website at www.glynnenvironmental.org.

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