

**Jackson, Galo**

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**From:** Maria Henderson  
**Sent:** Friday, March 13, 2015 5:23 PM  
**To:** Jackson, Galo  
**Subject:** Brunswick Superfund sites

Mr. Galo,

I want to thank you for turning your attention to such a serious situation that many have ignored for decades. I won't go into my entire personal history regarding being poisoned by these toxins because it would take pages, but will share a few of the highlights. I grew up near many of the SuperFund sites, and have been very sick from about the age of five on, and in my life I have had eighteen bouts of serious pneumonia, chronic leukemia, neurological issues due to chemical toxins in my brain, and many other serious diagnoses. I was in and out of hospitals...once having wires drilled into my head while awake (at the teaching hospital in Augusta, Georgia) because they were trying to find out why I was having seizures that started at twenty (I do not have epilepsy), their next step was to shave my head and insert a metal plate. An angel of a nurse came in and told me I should leave b/c they didn't know what was wrong with me and I was being used as a guinea pig! All the nurses wore suits like people wear at contamination sites because it was when AIDS was just coming to light, and they were concerned that is what I had, but of course I didn't thank goodness. Can you imagine the fear and grief I felt? I was the age of a college kid and my life was just supposed to be taking off. Then I ended up at the Boston Children's Hospital under the care of a John Hopkins trained doctor who was smart enough to realize I had chemical poisoning, so at the age of 20 (I had had to leave college because of being so sick) he sent my blood work to a lab specializing in chemical poisoning. They wrote him a personal note saying they had never seen such high levels of dioxin and mercury in a living human being, and it was a miracle I was alive. They didn't even know to test for toxaphene or other chemicals. I have been told the same by many doctors, even recently, that they were expecting me to pass at any time. I am a fighter, and although there have been many times I was so sick I wanted to die, I kept on for my family (who also have many health problems related to this situation) and for my Godchildren (one of whom grew up on Saint Simons Island and had leukemia at four, his Mother has had breast cancer, his Grandfather liver cancer, and Grandmother died from cancer that had spread all over her body. So this isn't an issue that just affects the poor or the African American community which many believe, it reaches even the wealthy on Saint Simons Island/Sea Island many of whom are unaware. I grew up in Glynn County so I know all about racism/elitism and it disgusts me. I know that this is in part is what has stalled a thorough clean up.

I like everyone from the community do not want this issue to affect tourism, jobs or embarrass my hometown. Having said that, I care more about keeping people healthy, especially the children who have no voice. But if something is not done about this local scenario, it will eventually make its way into the larger public. I had a friend who was a producer on Oprah's show, she approached me and got us into the final five potential shows that would be airing before Ms. Winfrey retired from that job. The show was to be on the effect of chemical toxicity in the environment and its link to health. I have also been approached by 60 minute producers etc. I have spoken with Erin Brockovich. It is like a volcano that is waiting to blow. While some might not pay attention to sick humans, they do pay attention to tv, and also a place that has the most toxic dolphins in the world.

I would rather see this cleaned up quietly, I know many would prefer that as well. Before that time, there should be signs all around the rivers, land, buildings and notices should be sent to residents about the contaminated ground water until outside, knowledgeable and unbiased parties agree that the danger has been eliminated.

My paternal Grandmother worked in the shipyards during WWII as a way to help her country. I am sure she was exposed to God knows what and she died of cancer. My father has struggled with cancer as well. He fished every weekend, often in Turtle River, while we played, packing the mud on our bodies like kids do, not knowing we were releasing poison into our systems. We had an entire freezer filled with fish, shrimp and crab that we ate on almost a daily basis. Because I had so many health problems, I tried to eat right/live healthy, exercise (when I was strong enough), and instead of drinking coca cola like most good Southerners, I drank water. Unbeknownst to me, I was drinking poison. We swam in the creeks, and took baths in this contaminated ground water. I also attended Altama



Elementary school where it took thirty years after I had left for them to shut the school down because of the high levels of toxaphene STILL in the soil/water. To say this situation has affected my life adversely would be a gross understatement. It has kept me from having children which was my greatest dream, the financial stress was largely responsible for the dissolution of my first and only marriage, and I have spent just about every penny I have ever earned keeping myself alive. My insurance dropped me when I was in my twenties because the doctors could not figure out what was wrong until it was too late. It ruined my credit. That makes things very hard. I have spent years in and out of bed, often in a semi comatose state with all kinds of issues that I know relate directly back to a compromised immune system due to early childhood chemical poisoning, a time when my brain and body and many systems were still forming. I have tried to chelate the toxins out but they are so deeply embedded in my organs (I have been told by doctors) that I become deathly ill when an attempt is made (I tried anyway). I lost my business and all belongings recently which was devastating because I like to work, it is all I have in my life in many ways. As my body ages, it gets harder to stay well. This living nightmare has cost me almost everything, and while it is too late for me in many ways, it isn't too late to clean it up so that other local children won't suffer the way I have for 40+ years. Do you have children or grandchildren Mr. Jackson? I am sure you are someone who has a heart and compassion. If you can't do it for strangers, please think about the children you love and how you would want this to be handled to protect them from harm.

I am asking/pleading for you to help make this right. I have read over many comments that are being submitted, as well as the important questions you are being asked, that need to be answered honestly. I will not go there as surely this has been made very clear by others. I wanted to show you a personal side of this disastrous matter, in the hopes it will inspire you to do what needs to be done to thoroughly clean this mess up, to not do it half way. I pray that the team of lawyers and PR people that the corporations have hired do not win this battle. It is wrong for them to even try. Money means nothing if you don't have your health. I learned that first hand. They would feel differently if it were their sister, mother, father, child who was sick. I will continue to follow what I hope is positive progress in this matter because besides me, there are many who have been affected.

Most Sincerely,  
Marla Henderson

Jackson, Galo

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**From:** Jill Jennings-McElheney [REDACTED]  
**Sent:** Monday, March 16, 2015 11:57 PM  
**To:** Jackson, Galo  
**Cc:** Mccarthy, Gina  
**Subject:** Comments on LCP CleanUp

Dear Galo:

I am submitting these comments based on a newspaper article I read in January 2015:

<http://america.aljazeera.com/articles/2015/1/12/georgia-pollutionlcpsuperfund.html>

I am a Georgia native and reside in the Northeast part of the state. After my family and neighbors became victims of exposure from industrial waste that EPA egregiously and flagrantly misrepresented in HRS scoring in the 1990s, my 4 year old son was diagnosed with leukemia in 1998.

AFTER botched HRS scoring as an accepted pattern, and the negotiating of lives by EPA notated with "low target populations" justifying false scores to not trigger enforcement, my toxic residency in Athens, GA, and in other places like Asheville, NC/CTS are not cleaned up until victims come forth with their tragic stories. Then begins the behind closed doors remedial delays strategized and instigated by the perpetrators. The results are the same revictimizing of those who were violated by the agencies and poisoned by the industries. I doubt any rights through environmental regulatory have been afforded to victims of this nature in EPA Region IV.

At this time, I would like to submit my support for the clean up plan proposed by the Glynn Environmental Coalition.

I would also like to submit that victims' rights no longer be denied to families who have suffered at the hands of EPA botched HRS scoring followed by behind the scenes manipulation to delay site clean up. This unprofessional and unethical treatment of victims should cease immediately, and victims be afforded the rights to be fully disclosed and protected from deep pockets. The perpetrators should not be allowed to revictimize those they have externalized their waste upon.

Here is a list of victims' rights from the Department of Justice which should immediately be modified for the families who have tested for PCBs on Sapelo connected to this tragic two decade old violation of their human and civil rights.

<http://www.justice.gov/usao/resources/crime-victims-rights-ombudsman/victims-rights-act>

Thank you.

Sincerely,

Jill Jennings-McElheney  
[REDACTED]  
[REDACTED]  
[REDACTED]



Jackson, Galo

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From: Luanne [REDACTED]  
Sent: Sunday, March 08, 2015 1:57 PM  
To: Jackson, Galo  
Subject: LCP Chemicals Superfund Site Proposed Plan for the Marsh

As citizens of Brunswick GA and a board members of Glynn Environmental Coalition we would like to ask for your attention to the subject project please. We are concerned that there are no measurable goals, timelines to reach goals or alternative plans to implement if goals are not reached. Goals should include seafood safe to eat, mink once again living at the LCP site and dolphins health improving.

Additionally, cleanup was based on a study with only 4 percent African American participants despite the indisputable fact that 70 percent of the population for 1.5 miles around the LCP site is/was African American.

The plan completely ignores the marsh grass that accumulated PCBs in the root, rhizome, stem, leaf and detritus and excretes Mercury.

The Plan ignores Dioxin/Furan contamination and all the past data in fish and sediments and argues it is not needed based upon observations from a lake 1,000 miles away in Syracuse NY!

Protection of people has been ignored for over twenty years. Totally ignored. Cleanup of all PCBs and Mercury is most necessary since the EPA has failed to show competence to implement recommendations issued by health agencies for the past twenty years.

We are confident that if you give this issue your consideration you will see that there is only way this project should progress if the interests and health of all living things are to be protected in a fair and just way.

Very truly yours,

Frank Lea

Luanne Lea  
[REDACTED]



**John R. McQuown**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

March 16, 2015

Mr. Galo Jackson, Remedial Project Manager  
South Superfund Remedial Branch  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

Dear Mr. Jackson

The purposes of this letter are to request information, submit questions, and offer comments on the Proposed Plan for the LCP Chemicals Superfund Site. I expect these and any responses to be included in the official records of the Plan.

My wife and I are residents of St. Simons Is. We look out our back window onto a marsh that protects our house from the Atlantic Ocean about a half mile to the east. I am retired from IT consulting that included many projects for clinical trials of drugs. In a previous part of my career, I helped lead the founding of the Illinois EPA. I later prepared and presented testimony on several issues before the Illinois Pollution Control Board. I don't have the expertise that you and your staff do but I am an informed citizen on many issues involved in the LCP Site Plan.

I attended the first Public Comments session you held in Brunswick last November. I have studied the Proposed Plan documents as well as the materials submitted to you by Daniel Parshley for the Glynn Environmental Coalition (GEC). I have three topical areas to cover in this communication:

- The GEC's responses to the Plan;
- The hydrodynamic model(s) used in the Plan;
- The economic issues raised by the Alternatives in the Plan.

**The GEC Submissions**

I full-heartedly endorse the submissions of the GEC and Mr. Parshley. They are supported by years of experience in the field, the area, and the specific LCP Site. They reflect current and well gathered data and applicable published research. They provide important, even critical, considerations and corrections to the Proposed Plan. With these inputs, you should be able to make needed amends to the Proposed Plan. The pollutants involved will outlast you and I by several generations. Therefore, we should be working together to protect this environment.

**The Hydrodynamic Model (HDM)**

In the initial version of the Proposed Plan, there were a couple of off-hand mentions of such a model. In the Public Comments meeting, both you and one of your staff present indicated that you used a hydrodynamic model to test the proposed and recommended remediation design. I questioned this



model and you indicated it was standard for EPA. I expected that the follow-up from the meeting would provide details but, so far, nothing has shown up.

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The EPA Region IV website provides only two such models. Both are supposed downloadable from the site. One is one dimensional, according to the site. The other is supposed to be one, two, or three dimensioned according to the model user's selection. One model is validated by two western Georgia rivers while the other is validated by a North Carolina river that flows into the Atlantic Ocean without any indication of a mediating tidal Spartina marsh. It appears, therefore, that the hydrodynamic models available to EPA are of little or no applicability to the LCP site. *Is this the correct situation?*

In my career, I have used many and written some quantitative, statistical models. To use a model, it is necessary to identify the model's authorship, ownership, and the revision level used. *What is the pedigree and version of the HDM(s) used in the Proposed Plan?*

Whenever I've used a model formally, including in court testimony and published research reports, I have always taken pains to itemize the parameter settings and the data fed into produce the reported results. For example, you might have set minimum and maximum air temperature parameters and used a set of Weather Bureau temperature data to run the HDM for the Plan. *What were the parameters used and what was the data set(s) used in the HDM to test the recommendations?*

The Proposed Plan shows several maps of the LCP site and its surroundings to show where core samples for different pollutants were taken. I believe that sample sites numbered in excess of 80. *Were the sample sites predicted by the HDM's estimate of where pollutants spread since the initial remediation? Is this why the sampling was performed at the LCP site? If so, how well did the HDM predict the spreading? If not, why not?*

The remediation for the LCP site will need to address the long run effects, likely for century or more. *What does the HDM predict into the long future? What time horizons have been tested on the HDM? Will the results be reported in the Final Plan document?*

*Based on the HDM modeling, how complex and how frequent will future sampling be required?*

While the Glynn coast has tended to be missed by many hurricanes, sooner or later it will be hit. When it is, it could get hit by a "perfect storm" – a nor'easter and a hurricane. The storm surge could be awesome. If such a surge coincides with high tide, there will be major effects deep inland. *What does the HDM predict will be the pollution outcomes of such a storm? How will the capping and anchoring of the Proposed Plan hold up?*

#### The Economic Considerations

The Proposed Plan offers six Alternative remediation scenarios and recommends #6. Yet, it appears that, ignoring #2 – the all-out costly option, the highest cost is only a quarter more than #6 (\$28M → \$34M). This appears to provide remediation of three times more polluted area, up to 48 acres. *Why was the cheaper Alternative selected when a cheaper per acre option would provide more remediation?*

The Proposed Plan does not seem to address the social and governmental issues to sustain coping with the continued effects of polluting sediment at the LCP site. The only mentions of social adaptation are a) to put signs around the capped area and b) to put Do-Not-Eat warnings on the fishing website. *Who is going to check and maintain the signage? Who is going to remind DNR to keep warning fishermen?*

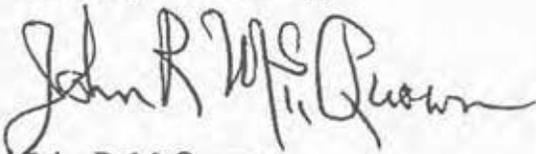
Proactive steps should be provided for, as well. For example, EPA address the Brunswick City Council and the Glynn County Commission after each general election that the LCP site is hazardous and not used for recreation or development. Likewise, police and game wardens need to be regularly reminded of the dangers. Perhaps, these could be done on a two year cycle.

Sampling needs to be done to check that the remediation is working. This could be on a four or five year cycle. Superfund money should be allocated but it would be more sustaining if the State carried out the sampling. In any case, the results should be reported to the public with each cycle.

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To conclude, thank you for your attention to these points. And thank you in advance for your responses to my questions and your follow thru to perfect the Plan. It is sad that earlier generations so abused the rich resources and beauty of this environment. Together, we can do better.

Sincerely and cordially,



John R. McQuown

cc: D.Parshley, GEC

Jackson, Galo

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From: Clay Montague  
Sent: Sunday, March 15, 2015 4:37 PM  
To: Jackson, Galo  
Cc: Satilla Riverkeeper; gec@glynnenvironmental.org  
Subject: Questions Pertaining to the Proposed LCP Superfund Cleanup

08 March 2015

Mr. Galo Jackson, Project Manager  
Environmental Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

Dear Mr. Jackson:

I have a number of questions listed below that pertain to the planned cleanup of the LCP Superfund Site in Brunswick, Georgia. I live on the nearby Satilla River estuary. I am an estuarine scientist and university professor, and I have substantial concerns about impacts of the LCP site on the people that live with the contamination. Moreover, it is apparent to me that contaminants from the LCP site can connect widely through hydrology, sediment transport, and fishery resources.

Earlier I shared the questions below with the Satilla Riverkeeper and the Glynn Environmental Coalition, two environmental groups with a history of involvement with the LCP site. However, I now understand that you are the correct "point person" for the EPA, so I'm submitting them directly to you during the ongoing public comment period scheduled to end on March 16th.

I have reviewed the following two documents pertaining to the EPA's plan to address contamination at the LCP Superfund site in Brunswick, Georgia:

- 1) U.S. ENVIRONMENTAL PROTECTION AGENCY SUPERFUND PROPOSED PLAN, LCP CHEMICALS SUPERFUND SITE. OPERABLE UNIT 1
- 2) BASELINE ECOLOGICAL RISK ASSESSMENT FOR THE ESTUARY AT THE LCP CHEMICAL SITE IN BRUNSWICK, GEORGIA

Listed below are eight sets of related questions from me. I hope you can help with the answers.

- ✓ 1) What assurances can be given that capping contaminated sediments in place (rather than removing them) can withstand storm intensities at least comparable to that required for coastal construction? Does storm preparedness for coastal construction require structures to withstand FEMA-determined flood levels, and 120 mph wind speed? What similar storm preparedness standards will be required for the capping project?  
Even with capping, might a storm with upland flooding and 120 mph winds suspend contaminated sediments in the LCP-contaminated sediments and spread them over the upland landscape into residential neighborhoods and businesses? During a flooding storm, would contaminated sediments settle onto roadways, where they could be further spread on the tires of roadway traffic, and suspended as dust into the air? Will construction criteria for a contaminant cap include even stricter minimum storm standards (based on higher flood levels and more powerful winds) in order to address the public risk of contaminant exposure during and after a storm? If a storm penetrates the cap, would contaminants spread far and wide once a bolus of contaminated sediments is suspended in coastal waters? Could any and all of the contaminants be spread by a storm, including mercury, lead, Aroclor 1268, PCBs, PAHs, dangerous dioxins, and others? If not, which would not be spread by a storm?



- 2) What warning signs have been posted in the estuary and at boat ramps to keep people from consuming fish and shellfish in the vicinity of the LCP site, and to keep boaters and swimmers from coming into contact with contaminated sediments? Who is responsible for these signs?
- 3) Are contaminated crabs still entering the public food supply? Are the sets of floats that are sometimes visible in waters adjacent to the LCP site from commercial or residential crab traps?
- 4) Have the people most likely to have been contaminated by LCP-tainted seafood been tested? Have sufficient numbers of people been tested for LCP contaminants? Has testing included those who eat large amounts of fish and shellfish from St Andrew Sound, Jekyll Sound, Jointer Creek, Christmas Creek, and the Satilla River estuary? Does the spin of the Earth (Coriolis effect) tend to turn local river discharges southward, which over the decades could have put contaminated sediments suspended at the LCP site into these areas, and along the beaches of Cumberland Island and into Christmas Creek? How many people have consumed large quantities of fish and shellfish from those waters during the decades of contamination at the LCP site? Has an effort been made to warn those people and to suggest that they be tested?
- 5) How is it known that only 81 acres of the 670+ acres of marshland at the LCP site is in need of remediation?
- 6) Is it true that 33 of these target 81 acres were not chosen for remediation because of concern over temporary damage to restorable marshland? If these 33 acres were included despite the damage to the marsh that might result, how would the amount and time frame of damage to the marsh compare to the risk to people that remains from leaving LCP-contaminated sediments in those 33 acres? Has this comparison of risk been the subject of a scientific risk assessment?
- 7) Among the contaminants allowed to remain in sediments at the LCP site, are any mutagenic or teratogenic, as well as carcinogenic? If so, what will be the risk of mutations and birth defects from human exposure to LCP-contaminated sediments, water, or seafood collected from impacted waters?
- 8) After the selected remediation process, what lasting risks to human health will remain? Who will be responsible for these and what remedies or recourse will they have? How safe will the environment be? Will children be safely able to swim and boat in Purvis Creek or in the nearby open waters of Gibson Creek and Turtle River? Will people be able to safely eat fish and shellfish caught in the vicinity? Will warning signs be needed, and if so, who will be responsible for the warnings?

Please feel free to share these questions among those at EPA who might be able to answer them. I look forward to your reply.

Yours sincerely,

Clay L. Montague

Clay L. Montague, PhD

Associate Professor Emeritus (Systems Ecology, Coastal Ecology) Howard T. Odum Center for Wetlands Department of Environmental Engineering Sciences University of Florida, Gainesville

Mailing Address: ~~245 Environmental Engineering Sciences Building, University of Florida, Gainesville, FL 32611-2021, Tel: 352-392-1500, Fax: (913) 265-5125~~

**Jackson, Galo**

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**From:** Kyle O'Keefe ~~and Hannah O'Keefe~~  
**Sent:** Monday, February 09, 2015 11:03 AM  
**To:** Jackson, Galo  
**Subject:** Glynn County

I urge you to take every measure to clean up the toxic mess that has been made of my beautiful childhood home. It is disgraceful what companies like LCP have done. I will be keeping an eye on the situation and spreading the word reporting your success in this matter. Thank you



Jackson, Galo

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From: Carolyn Rader [REDACTED] >  
Sent: Thursday, December 04, 2014 5:43 PM  
To: Jackson, Galo  
Cc: Carolyn Rader [REDACTED]  
Subject: Comments on the EPA proposal to clean up the Brunswick Superfund Site

Dear Mr. Galo,

I will not be able to attend tonight's hearing in Brunswick but I would like to submit comments in lieu of attendance in person. For many years I have been aware, through various organizations such as the Georgia Environmental Project led by Dr. Olin Ivey, in uncovering this toxic mess, and I am shocked to learn that the harmful impacts of this illegal and immoral dumping of toxic waste extends far beyond what was previously known or understood.

I have not had time to perform my own research or delve into the details but I would like to look up the work of the scientists at the Marine Institute because I recall that several papers were published on the heavy metal contamination in the salt marshes and estuaries around the Sapelo and the effects on oysters and other sea and marsh life. Their research on industrial and man-made pollution into the coastal water bodies led to the formation of the Marshlands Protection Act and other important legislation protecting Georgia's coastal resources. I lived on Sapelo in the 60s and early 70s so I am also concerned as to what extent I or my siblings were exposed to these chemicals at an early age in our development.

The Center for a Sustainable Coast is the premiere, scientifically backed environmental advocacy and policy organization for the Georgia Coast. My father, Dr. Jim Henry, the former director of the Marine Institute on Sapelo, and professor emeritus University system and Skidaway Island, was a founding member. I highly recommend that the comments you receive from David Kyler, the Center's director, on EPA's proposal for the Superfund site clean-up are taken very seriously and followed closely.

Thank you,

Carolyn Henry Rader

[REDACTED]

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Please consider expanding  
the current effort to clean  
up the site of the former  
KCP Plant in Brunswick, GA.

We believe the areas of  
contamination go far beyond  
your existing plan.

Joan + Charles Skellite

~~John Skellite~~

Brunswick, GA. ~~John Skellite~~

USE-THIS-SPACE-TO-WRITE-YOUR  
COMMENTS

Your input on the Proposed Plan for the LCP Chemicals marsh important to EPA. Comments provided by the public are valuable in helping EPA select a final cleanup remedy for Operable Unit 1 of the Site.

You may use the space below to write your comments, then fold and mail. Comments must be postmarked for receipt by EPA no later than February 2, 2015. If you have questions about the comment period, please contact Mr. Galo Jackson, 404-562-8827. Those with electronic communications may submit their comments to EPA at the following email address: [jackson.galo@epa.gov](mailto:jackson.galo@epa.gov) on or before February 2, 2015.

Note: In order to permit the community ample time to review and comment on this Proposed Plan, a 30 day extension to the initial 30 day comment period has been allowed for, concluding the comment period on February 2, 2015.

One would think that an agency of the Federal Government has the resources and capacity to update public communications. The failure to do so is indicative of the general disregard exhibited towards the public by the regulatory agencies. This is not new. If the general welfare of the people and the health of the environment had been properly valued long ago we would not now be

dealing with accumulations of toxic wastes and a poisoned atmosphere. That the fish are not fit to eat, the waters are not clean enough to drink and the air to breathe is unconscionable. Issuing advisories to the public that they should stop eating, drinking and breathing is unacceptable as unacceptable as the Republican health care plan to "die quickly."

A society which permits its members to die in the prime of life will not long survive.

Also, since mobility is one of the essential characteristics of organic existence, precluding human access to a particular terrain is not "protective."

The LCP Chemical site is contaminated. The contamination needs to be removed.

Name MONICA SMITH  
Address [REDACTED]  
City [REDACTED]  
State GA  
Zip [REDACTED]



2/2/15

Deborah Ann Strong Comments to U. S. Environmental Protection Agency  
Superfund Proposed Plan, LCP CHEMICALS SUPERFUND SITE, Operable Unit 1, Nov. 2014

## Introduction

I am a former employee of the Environmental Protection Agency Headquarters and worked in the Office of General Counsel as a secretary between January 1977 and June 1978. My boss was Joseph Zorc who was an Assistant General Counsel responsible for the grant appeal process re Wastewater Treatment Plants. This is where I learned about the Superfund process. When I told him I was moving to Brunswick, Georgia he recommended I seek employment with Bishop & Bishop law firm. The only thing I recall him sharing with me about the Brunswick area was that they wanted to build a causeway from the North end of St. Simons Island through protected marshland (Jimmy Carter from Georgia served from 1977 to 1981 and the marshlands were being protected.) I gathered from what he said that it was never going to happen.

## History

When I told my father, Richard L. Strong, Command Sergeant Major, U. S. Army that I was moving to Brunswick, Georgia he said "Isn't that the place that stinks?" I didn't know at the time, but it turns out he was right. Even so, I had just been working for the Environmental Protection Agency and knew there were laws in place to protect the citizens so I didn't worry about it.

Subconsciously I must have worried. When my husband, Donald Parkhurst, who worked for the Federal Law Enforcement Training Center (FLETC), and I looked for a house we told the realtor that we wanted to live far enough away from Hercules that we didn't have to smell it. We ended up on the north end of Glynn County just before the Altamaha River. The area north of us is the marshland that Mr. Zorc was referring to where they wanted to build a causeway.

My first child, Jody Rae Parkhurst, was born February 18, 1980. She was over a month overdue, but I didn't have any warning ahead of time that she would be born with birth defects so severe that the doctors at Shands Hospital in Gainesville, FL would later tell me that there had only been about thirty babies in history with similar conditions that had lived . . . the doctor in Brunswick said that she should have been a miscarriage. She died when she was eleven days old on February 29, 1980 from renal failure. About three days after her funeral the EPA shutdown the Hercules 009 Superfund site. I started following and clipping articles about toxic sites in Glynn County. What really surprised me at the time was that I could live in Brunswick, Georgia for a year and a half and never hear anything about polluted sites from friends, at college or at work.

In August of 1981 I was at the movies at Lanier Plaza next to the Hercules plant when I passed out. An ambulance was called; the emergency medical technician who checked me out said that I had probably just cut off my circulation from sitting too long – I was nine months pregnant and was not transported. I should have realized when I left, and there was a young boy in the lobby having a seizure, that I had been exposed to something through the ventilation system. It wasn't until that child's permanent molars came through without enamel, and I was told that it was probably something that happened right before she was born or when she was

2/2/15 Deborah Ann Strong Comments to U. S. Environmental Protection Agency  
Superfund Proposed Plan, LCP CHEMICALS SUPERFUND SITE, Operable Unit 1, Nov. 2014

~~very young that caused it, that I thought I had been exposed to something through the~~  
ventilation system. In those days our only two theaters in Glynn County were the one at Lanier Plaza and the Drive-in next to LCP, which I also went to.

I encountered a lady in the Kroger's grocery store. Who asked me what stunk. I told her what I believed at the time – Hercules, but it could have been the pulp mill. She was from up North and wanted to know what the community was doing about it. I started listing out all the reasons I had heard over the last couple of years about why nothing was ever done about it . . . jobs, retaliation, etc... And, then she asked me why I wasn't doing anything about it and I didn't have an answer. I of all people, have a reason to do something about it. And, so I have tried.

I attended what I believe was the first public hearing on the 009 site and was surprised when the EPA would not accept the autopsy report on my daughter, Jody, because it would violate her privacy. I remember saying to the audience that now we know why EPA doesn't have any reports of problems associated with the site because they won't accept them when people try to hand them to them. I wanted to give the report to her because I did not think they would associate her condition with the site because my address at the time was north Glynn County. But, when she was conceived I lived in an apartment on Altama Avenue less than a mile from the site; and, met a carpool at Lanier Plaza next to Hercules to commute to Kings Bay to work. The next speaker after me was an instructor at the Federal Law Enforcement Training Center, where I worked at the time, who had recently had a baby born without kidneys and had died. Apparently I forgot to identify myself when I spoke, so she identified me for EPA (and I had signed in). But, on the transcript my name was spelt wrong [it was Deborah Parkhurst at the time]. This meeting was the first time I had encountered Dr. Pegg who was the technical advisor for the Glynn Environmental Coalition. I already knew who Daniel Parshley was because I worked for the Deputy Director of the Federal Law Enforcement Training Center and recognized his name as a role player working for a contractor at FLETC.

By the time I attended the 009 Superfund Site hearing I had, had three more daughters who appeared healthy based on prenatal screening and at birth. They were bused to Burroughs-Molette Elementary School at 1900 Lee Street, Brunswick, Georgia 31520 which is less than a mile from the Hercules plant. Other than the fact that my first daughter had to be at the bus stop at 7:00 a.m.; and, had to ride through the Marshes of McKay neighborhood before heading to Burroughs-Molette; and, that she typically threw up on the bus when she passed the Hercules plant; and, often arrived at school late after 8:00 a.m. Besides all that she basically adjusted well. Not long after she started school my third daughter started a pre-school nursery program at Brunswick High School which I think was less than a mile from the LCP site and Georgia Pacific Pulp Mill (as the crow flies). It wasn't until my children started school that I realized how sick our community was. By the time the third child started at Burroughs-Molette there was a kindergarten teacher, Johnny Falstrom [from memory], who died of cancer. And, the fourth daughter was starting at the Brunswick High nursery school where the teacher, Mrs. Vaughn, had cancer. When she started high school there years later her social studies teacher who was the Georgia teacher of the year two years in a row had cancer.

Deborah Strong

2/2/15 Deborah Ann Strong Comments to U. S. Environmental Protection Agency  
Superfund Proposed Plan, LCP CHEMICALS SUPERFUND SITE, Operable Unit 1, Nov. 2014

~~Around this time there was an Office of Civil Rights (OCR) Complaint filed by a group I was a member of – Positive Action for Children and Teachers (PACT). The complaint was alleging racism regarding busing and how handicapped students were being served. The OCR agreed to investigate. One of the leaders who signed the initial complaint, Sandy Rumanek, told me that she was contacted and told that they had a limited budget and she should select one or the other for them to investigate. She told me they dropped the part about the handicapped students. The investigation was enlightening. At that time, St. Simons Elementary School on the island had televisions in the classroom (Which we thought was an advantage because they were not teaching reading phonetically so it helped to see the words of what was being said on closed caption.) ; Burroughs-Molette did not have televisions until right before the investigation; and then they weren't hooked up. At any rate, one of the investigators called Sandy to say that the report he submitted was not the one that she would be receiving and that he had resigned. The OCR did not find racism.~~

Like so many of the people in Glynn County who try to make a difference and can't, she moved. We had been attending school board meetings for a while and one of us had to run, so I did and won. The night before the election my dad called me to tell me he had cancer. I had been putting together what I had learned about the schools and their bussing and what I knew about the environmental hazards in the community and I concluded that there was environmental racism going on. I didn't want to file a complaint at that time because I didn't want to be tied up with that when my dad was dying. He died on April 1, 1993 from Agent Orange; something he was exposed to in the Vietnam War. I hear it was produced at Hercules in Glynn County. I filed a complaint with the OCR in Atlanta, but they selected not to investigate. So I filed a complaint with the Department of Justice alleging environmental racism and they did investigate. They intervened in the bankruptcy hearing which prevented LCP from being able to sell the plant which lead to their shut down. The Department of Justice never came back and told me that they found environmental racism, but the Atlanta Constitution Journal ran a story on Tuesday, December 28, 1993 by David Pace of the Associated Press entitled *Toxic hazards found worse near homes of blacks, poor* where he wrote:

In Georgia's most polluted community, encompassed by the Brunswick ZIP code 31520, five plants spewed out 6.3 million pounds of 27 toxic chemicals in 1991. A little more than 21,000 people live in the area, half of them black and nearly a quarter below the poverty line.

Among the chemicals released into the air, land and water in 1991 were 922,000 pounds of acetone and 523,390 pounds of chloroform, both known carcinogens, and 213,500 pounds of xylene and 52,000 pounds of methylethyl ketone, both of which are suspected of causing birth defects.

Over the years, I have followed the toxic sites in Glynn County and attended the public hearings that I was aware of. I served on the Glynn Environmental Coalition for four years after I got off the school board. I didn't always agree with Daniel Parshley and was very disappointed when Dr. Pegg told me in July 2009 that Daniel had fired him for not being responsive to emails. He said Daniel was sending emails to his old fccj.edu address, but the college name had changed

Deborah Strong

2/2/15

Deborah Ann Strong Comments to U. S. Environmental Protection Agency  
Superfund Proposed Plan, LCP CHEMICALS SUPERFUND SITE, Operable Unit 1, Nov. 2014

~~and he had told him that it was now fscj.edu. I could not imagine how a new technical advisor could ever get up to speed with everything that had happened over the past ten years or more. I attended one of the meetings where the new technical advisor was introduced and was surprised to see so many in attendance. Several introduced themselves as being with the role players at FLETC.~~

I attended the December 4, 2014 public hearing about the proposed plan for Operable Unit 1; there was a meeting prior to the EPA hearing for the Glynn Environmental Coalition which I attended. At that point, it was hard to judge how effective the new technical advisor was, but once in the hearing the audience was bringing up things that Dr. Pegg could have spoken to because he attended the meetings with ASTDR, but the new technical advisor was not able to speak to. I left the meeting happy about the attendance and the fact that Mr. Killian had spoken up on behalf of our future grandchildren, but bewildered. After all in the beginning when people brought up wildlife that would be affected they talked about wood storks not dolphins. There is a big difference. One was protected at the time the plant was closed down and the other wasn't. It's bad enough that the federal judge dropped the wood stork charges in the federal hearing, but does the EPA have to forget about them too?

**Conclusion**

I read all 50 pages of the proposed plan and I believe the EPA did an excellent job explaining the process and explaining their rational for the preferred selection. But, I have also participated in decisions regarding contaminated school grounds and the other toxic sites in Glynn County and it seems like we never get a cleanup, we get a cover up. I thought just this one time we could actually get a cleanup. I prefer Alternative 2. I agree with Mr. Killian who cited concerns for future generations. I have read a book called *Now That You Know* by McGregor Smith, Jr. that talks about *The Seventh Generation Test* in Chapter 1, page 3:

The Council reviewed decisions made by the chiefs. The old women sat in a circle and applied what they called "the Seventh Generation Test." They did not debate. They sat in silence and pondered the issue presented to them. Their question was simple: "How will the decisions made by our chief affect our children seven generations into the future?"

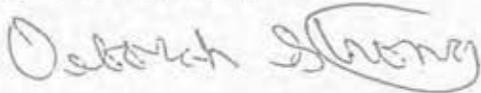
I'm asking you to review your decision and ask yourself the same question. Why should you do that? Because I believe the public participation component of the process has been compromised by the multiple changes in site manager for the LCP superfund site and the replacement of our technical advisor ten years into the process. I also believe that the whole purpose of the technical assistance grants in the superfund process is so that the community can be represented between industry and government. In this case, the government hasn't helped us. The federal judge dropped the woodstork charges in the LCP conspiracy prosecution [which I believe he did because if they prosecuted LCP for it they would have to prosecute all the other industries in Glynn County that were violating it.]. The Georgia EPD was responsible for enforcing the environmental laws in Georgia when these violations occurred. Of course they will go along with what EPA wants. Some of the lead we are talking about cleaning up

50 pages of report

might actually have come from the Glynn County Firing Range next to the site. The Navy had permits at Glynco to pollute the Altamaha-Brunswick Canal, an historic site which has not been considered in the cleanup.

Another way I believe the community has suffered and will continue to suffer with the proposed cleanup is with health insurance. When we apply for insurance we are asked three questions: 1) how old are you, 2) do you smoke or have you smoked within the last however many months or years, and 3) where do live. The last question factors in to how much we are charged for insurance and one of the things insurance companies take into consideration is the health status of the community. If the poison remains at LCP we will likely be charged more money to be insured. Which is just wrong since we paid for state and federal regulators to administer the environmental laws; and, we are punished by being sick or having babies with birth defects and we are punished again in attempt to stay healthy.

Deborah Ann Strong

A handwritten signature in black ink that reads "Deborah Strong". The signature is written in a cursive style with a large, looped "S" at the end.

**Jackson, Galo**

---

**From:** Wilson [REDACTED]  
**Sent:** Sunday, March 15, 2015 9:22 PM  
**To:** Jackson, Galo  
**Subject:** Brunswick/St.Simons Isl. River Clean Up

Mr. Jackson, please make sure the EPA takes measures to thoroughly clean up the toxic chemical sites around Brunswick/Saint Simons Island Georgia that affect our rivers, Saint Simons Sound, the soil and ground/drinking water which spreads like underground rivers, and of course seriously affects our health and all children in the area.

Sincerely,  
James Wilson Patrick



#1

Cleanup of the LCP site will not be complete until toxins from the contaminated marsh are removed from our food chain.

I want to know that the seafood and the water in my community are safe for my family and me.

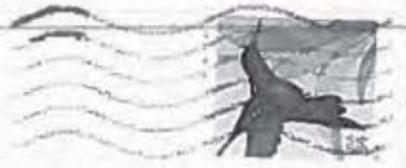
Signed,

*Cora Lee Namah*

[Redacted]

Brunswick, Ga

31523



TO:  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

Cleanup of the LCP site will not be complete until toxins from the contaminated marsh are removed from our food chain.

I want to know that the seafood and the water in my community are safe for my family and me.

Signed,

*Ray Blooker*

Brunswick, GA 31520

303893199



TO:  
Galo Jackson  
Environment  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303



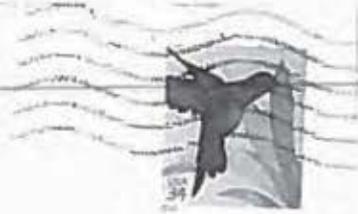
10989551

Cleanup of the LCP site will not be complete until toxins from the contaminated marsh are removed from our food chain.

I want to know that the seafood and the water in my community are safe for my family and me.

Signed,

Ceremy Cook  
Buck Br  
3520



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

Cleanup of the LCP site will not be complete until toxins from the contaminated marsh are removed from our food chain.

I want to know that the seafood and the water in my community are safe for my family and me.

Signed,

Alice Wick  
[Redacted]  
Brunswick Ga  
31525



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

Cleanup of the LCP site will not be complete until toxins from the contaminated marsh are removed from our food chain.

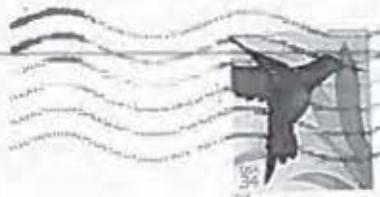
I want to know that the seafood and the water in my community are safe for my family and me.

Signed,

Wesley Dewarger

~~████████████████████~~

Townsend, GA 31331



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

Cleanup of the LCP site will not be complete until toxins from the contaminated marsh are removed from our food chain.

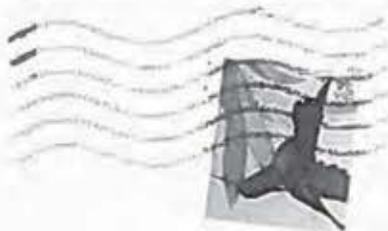
I want to know that the seafood and the water in my community are safe for my family and me.

Signed,

Helen Jackson

~~████████████████████~~

Brunswick, GA 31520



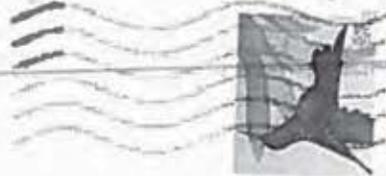
**TO:**  
Galo Jackson  
Environmenta!  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

03853199



#2

The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.



I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

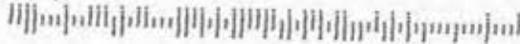
**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

Signed,

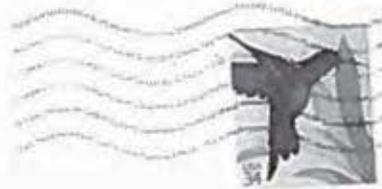
Chuck Latham

~~████████████████████~~

Brunswick, Ga. 31520



The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.



I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

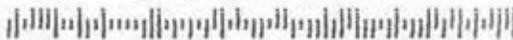
Signed,

Scott Smith

~~████████████████████~~

Brunswick GA 31520

303893199



10989552

The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.

I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

Signed,  
*Vale M. Coolidge*  
*BWK CA 31520*



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303



The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.

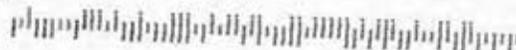
I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

Signed,  
*Cheryl Knight*  
*Brunswick, GA 31520*



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

103893199



The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.

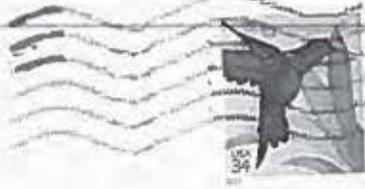
I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

Signed,

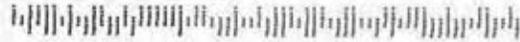
*[Handwritten signature]*

~~████████████████████~~

BWK, GA 31520



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303



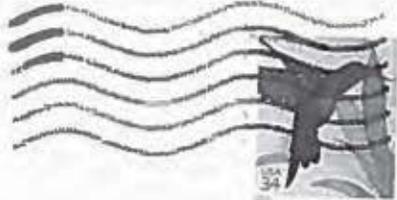
The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.

I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

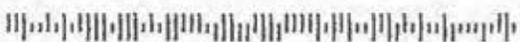
Signed,

*[Handwritten signature: Jeda Cook]*

BWK GA 31520



Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303



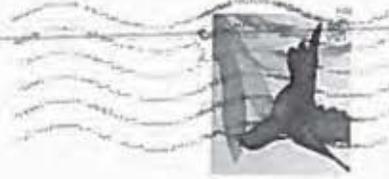
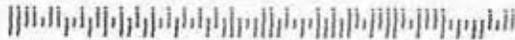
The proposed remedy to cleanup the LCP site is not enough to remove toxins from the contaminated marsh.

I want a remedy that cleans up our food chain and ensures the health of my children.

Signed,

*Shirleen Thomas*

~~██████████~~  
~~██████████~~  
BWK. GA 31525



**TO:**

Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

The proposed remedy to cleanup the LCP site is not enough to remove toxins from the contaminated marsh.

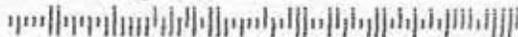
I want a remedy that cleans up our food chain and ensures the health of my children.

Signed,

*Debra Patterson*

~~██████████~~  
~~██████████~~  
Brunswick, GA. 31523

103893199



**TO:**

Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

The proposed remedy to cleanup the LCP site is not enough to remove toxins from the contaminated marsh.

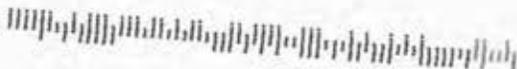
I want a remedy that cleans up our food chain and ensures the health of my children.

Signed,

M'shaunda Nooten  
~~31520~~  
Brunswick GA 31520.



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

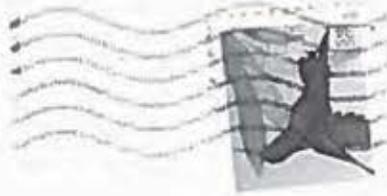


The proposed remedy to cleanup the LCP site is not enough to remove toxins from the contaminated marsh.

I want a remedy that cleans up our food chain and ensures the health of my children.

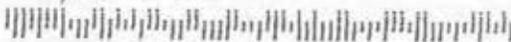
Signed,

Cathy H 203  
Brunswick, GA 31520



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303

103893199



The proposed remedy to  
cleanup the LCP site is not  
enough to remove toxins  
from the contaminated  
marsh.

I want a remedy that cleans  
up our food chain and ensures  
the health of my children.

Signed,

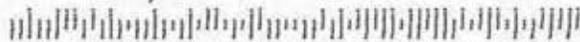
*Barbara Miller*

~~██████████ ██████████~~

*Brunswick, GA 31523*



**TO:**  
Galo Jackson  
Environmental  
Protection Agency  
61 Forsyth Street  
Atlanta, GA 30303



TO: GALO JACKSON  
ENVIRONMENTAL PROTECTION AGENCY  
61 FORSYTH ST  
ATLANTA GA 30303

CLEANUP OF THE LCP SITE WILL NOT BE COMPLETE UNTIL  
TOXINS FROM THE CONTAMINATED MARSH ARE REMOVED  
FROM OUR FOOD CHAIN.

I WANT TO KNOW THAT THE SEAFOOD AND THE WATER IN  
MY COMMUNITY ARE SAFE FOR MY FAMILY AND ME.

NAME

ADDRESS

Margaret Wicket

Madeline Smith

Sarah Malnnis

Amanda Kline

Beth Burk

Draw Weldon

Bella Bartisand

Rachel Brand

John Mahar

Jessica King

**RESPONSIVENESS SUMMARY**

**ATTACHMENT 3**

**Transcript of the December 4, 2014 public meeting**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

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LCP CHEMICALS SUPERFUND SITE

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\*  
\*  
\*  
\*

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PROPOSED PLAN PUBLIC MEETING

---

Brunswick Glynn County Library  
208 Gloucester Street  
Brunswick, Georgia

Thursday, December 4, 2014  
6:02 p.m. - 8:00 p.m.

P R E S E N T:

ANGELA R. MILLER  
EPA Community Involvement Coordinator

GALO JACKSON  
EPA South Superfund Remedial Project Manager

MARK SPRINGER  
EPA Environmental Response Team

KEVIN P. KOPOREC  
EPA Human Health Risk Assessor

SHARON R. THOMS  
EPA Ecological Risk Assessor

DERECK MATORY  
EPA Region 4 Section Chief

STACEY A. HAIRE  
EPA Site Attorney

ORIGINAL

**Gilbert & Jones**  
Certified Court Reporters

P.O. Box 1894 (31521)  
1607 Norwich Street  
Brunswick, Georgia 31520  
(912) 264-1670

[gilbertandjones1@bellsouth.net](mailto:gilbertandjones1@bellsouth.net)

P. O. Box 14515 (31416)  
7505 Waters Avenue, F3  
Savannah, Georgia 31406  
(912) 355-0320

## P R O C E E D I N G S

\* \* \*

MS. MILLER: Good evening. For the sake of time we're going to go ahead and get started. I know people are still signing in, but we have to be out of here at 8 o'clock. So, we want to go ahead and get started.

My name is Angela Miller. I'm with the Environmental Protection Agency. I'm a Community Involvement Coordinator working on the LCP site. Tonight we're here to present a proposed plan that we have to clean up the LCP Chemicals' marsh. The comment period for the proposed plan actually started today. Our normal comment period is 30 days, but Glynn Environmental Coalition asked for an extension, so we've granted 60 days.

So, your comments can be submitted tonight, or you can mail them to Galo's office back in Atlanta, or you can e-mail them to Galo as long as we receive them by February 2nd, so from today to February 2nd.

We have documents in the administrative record here at the library if you need to review some of the materials that helped us get

1 to the decision where we're at today. Galo's  
2 going to give a presentation. He's going to  
3 try to keep it to about 30 minutes, so then we  
4 can open it up to questions and answers. I do  
5 have a court reporter here that's transcribing  
6 everything, so when we get to the questions and  
7 answers if you can stand up, say your name, and  
8 spell any unusual names for the report.

9 Again, if you don't get a comment in or if  
10 you have a question after we leave today you  
11 can still submit that up until February the  
12 2nd. I have some cards. You can contact me,  
13 and I'll be glad to get that information to  
14 Galo.

15 With that I'm going to turn it over to  
16 Galo, and if you have any questions if you  
17 could just hold them until the  
18 question-and-answer period that would be great  
19 so we can get done and have plenty of time for  
20 questions and answers. Thank you, so much.  
21 Galo?

22 MR. JACKSON: Welcome. My name is  
23 Galo Jackson. I'm the RPM for the LCP site --  
24 or one of the RPMs -- remedial project  
25 managers -- for the LCP site. In this

1 presentation I'll be introducing the site team,  
2 briefly, go over the site history, summarize the  
3 risk assessments, go over the cleanup  
4 objectives, a description of the cleanup  
5 alternatives, the alternatives evaluated, and  
6 present EPA's and the state of Georgia's  
7 preferred remedy.

8 The people that have been working on the  
9 LCP site for a number of years are Mark Springer  
10 with EPA's ERT, Environmental Response Team, in  
11 New Jersey; Kevin Koporec, Human Health Risk  
12 Assessor; Sharon Thoms, Ecological Risk  
13 Assessor; Derek Matory my Section Chief; and  
14 Stacey Haire, the site attorney.

15 The LCP site was listed on the National  
16 Priorities List in 1994. This sketch shows a  
17 Superfund process. Recently we have concluded  
18 the remedial investigation and feasibility study  
19 for the LCP Chemicals' marsh. We're here at the  
20 proposed plan stage on the verge of selecting a  
21 remedy for the marsh. In the next couple of  
22 years the remedy will have to be designed to be  
23 implemented.

24 The site had soon after the listing a  
25 removal -- that I'll go into in some detail--

1 performed. Just to remind everybody EPA'S  
2 mandate under Superfund is site characterization  
3 to determine the nature and extent of the  
4 contamination, conduct baseline risk assessments  
5 to establish whether unacceptable risk exists or  
6 not, remedy selection, and remedy  
7 implementation. Those are the constraints that  
8 we have to work under.

9 The LCP marsh was divided into four  
10 domains during development of one of the risk  
11 assessments. This slide has a mistake in that  
12 this should be Domain 2 here and that 3. This  
13 slide shows the four domains with the site's  
14 uplands to the east or to the right. These are  
15 the uplands.

16 The physical separation of the LCP marsh  
17 by drainage features lead to the designation of  
18 domains which are mostly marsh areas of similar  
19 physical setting and contamination  
20 characterizations. The smallest domain is  
21 Domain 1. It lies east -- west of the uplands  
22 and east of the Eastern Creek.

23 Domain 2 lies -- this is the error I  
24 mentioned. Domain 2 lies west of Eastern Creek  
25 and east of Purvis Creek. Domain 3 lies east of

1 the causeway which is an extension of the  
2 entrance road and east of Purvis Creek. Domain  
3 3 is shown in purple. This is Domain 3. It's  
4 showing in purple on this slide, and it's north  
5 of the LCP Ditch. Domain 4 which is about 417  
6 acres is located west of Purvis Creek and is the  
7 largest domain.

8 This slide shows that the site for most of  
9 its history has been industrial. It began being  
10 used at a refinery starting in 1919 and has  
11 continued to be industrial through the years  
12 that Georgia Power operated a refinery. There  
13 was a paint and varnish operation there, and in  
14 1955 Allied Chemical constructed a chlor-alkali  
15 plant there, and in 1979 LCP Chemicals purchased  
16 most of the site and continued to operate the  
17 chlor-alkali facility.

18 As you may recall during the late 1990s  
19 there was a removal undertaken overseen by EPA.  
20 This figure shows in yellow the extent of some  
21 of the uplands removal and all of the marsh  
22 removal completed in late 1990s. About 142,000  
23 cubic yards of upland waste which is equivalent  
24 to about 39,000 tons of sediment were removed as  
25 well as associated contaminated soil.

1           In addition 13 acres of former landfill,  
2           which is what's shown in orange -- located in  
3           the marsh and shown in orange as well as 2,650  
4           linear feet of creek and ditch shown in green  
5           and purple were also removed. The color codes  
6           for the marsh show removal of the upper one foot  
7           and up to, in a limited number of cases, two  
8           feet.

9           This next slide shows the conditions of  
10          mercury before the removal and after the  
11          removal. The take-home message from these  
12          slides is that -- the graph on the left shows  
13          that before the late 1990s removal about 75  
14          percent of the mercury samples were above ten  
15          parts per million.

16          The graph on the right shows that -- the  
17          current situation shows that 30 percent of the  
18          mercury concentrations are greater than ten  
19          parts per million.

20          This is a similar slide for Aroclor-1268.  
21          Note the difference in the vertical scale on  
22          these slides by the way. The graph on the left  
23          shows the distribution of Aroclor-1268 which is  
24          a PCB in the sediment. It shows that before the  
25          removal about 70 percent of the PCB

1 concentrations were above ten parts per million.

2 The graph on the right shows that 10  
3 percent of the PCB concentrations are currently  
4 above 10 parts per million.

5 Relying on the chemical data collected  
6 since the mid-1990s over the past couple of  
7 years the remedial investigation for the marsh  
8 and both baseline human health and ecological  
9 risk assessments have been completed. The  
10 objective of the remedial investigation was to  
11 determine where the contamination is located and  
12 what it is.

13 The goal of the human health and  
14 ecological risk assessments were to estimate the  
15 risk posed by the contaminants to humans and  
16 organisms living in the marsh and exposed to the  
17 contaminants.

18 The risk assessment looked at all media.  
19 The major contaminants of concern for the marsh  
20 were mercury including methylmercury, the PCB  
21 Aroclor-1268, lead, and total PAHs. The latter  
22 are constituents of petroleum.

23 This slide -- I want to point out this  
24 is -- on this slide I'll refer to it as the  
25 Eastern Creek, the LCP Ditch. This is Purvis

1 Creek here, and this is what I'll refer to as  
2 the Western Creek Complex. This slide shows  
3 mercury concentrations in the upper 12 inches of  
4 the sediment.

5 Mercury concentrations of over 12 parts  
6 per million are shown in red. Green shows those  
7 mercury concentrations less than one part per  
8 million. Generally the higher concentrations of  
9 mercury remain in the Eastern Creek and former  
10 LCP Ditch.

11 This makes sense because the  
12 mercury-contaminated waste was piped from the  
13 uplands to the outfall pond which flowed into  
14 the LCP Ditch which in turn joins the Eastern  
15 Creek. There is some elevated mercury present  
16 outside the creeks and channel banks  
17 particularly on the flanks of the Eastern Creek.  
18 Only a very small fraction of the mercury is in  
19 the methylated form which is the more toxic  
20 form.

21 This is a similar slide for the PCB  
22 Aroclor-1268. Aroclor-1268 over 18 parts per  
23 million is shown in red, and it appears to be  
24 much better confined to the creek and ditch,  
25 much more so than mercury which appears to have

1 spilled over the banks.

2 There exists a few isolated detections of  
3 Aroclor-1268 in Domains 2 and 3. Note also the  
4 absence of red in the areas that were removed in  
5 the late 1990s.

6 This is a similar slide for lead. The  
7 higher lead concentrations are found in the  
8 Domain 3 Creek. They're shown in  
9 concentrations. Concentrations over 90 parts  
10 per million are in red. Lead is a contaminant  
11 of concern of ecological risk not to humans.  
12 Lead in Domain 3 north of the causeway -- this  
13 is the causeway, and I'm talking about this red  
14 here -- may be due to some of the refinery  
15 operations.

16 The PAHs or polynuclear aromatic  
17 hydrocarbons are associated also with the  
18 Domain 3 Creek up here. There exists a couple  
19 of samples over four parts per million in the  
20 Eastern Creek and the LCP Ditch, but PAHs are  
21 contaminants of concern for ecological risk but  
22 not for humans.

23 Superfund requires that EPA determine  
24 whether an unacceptable risk exists at the site.  
25 The baseline human health risk assessment's

1 estimated risk, both cancer and noncancer. The  
2 acceptable excess cancer risk ranges between one  
3 in a million and one in 10,000. EPA is directed  
4 to reduce excess cancer risk to less than one in  
5 10,000.

6 For noncancer risk EPA's goal is to reduce  
7 the hazard to less than one. In a few slides  
8 I'll show the cancer and noncancer estimates for  
9 the LCP marsh.

10 The baseline human health risk assessment  
11 examined the following exposure scenarios.

12 Direct contact with the sediment by a  
13 hypothetical marsh trespasser, the eating of  
14 finfish and shellfish based on area-specific  
15 ingestion rates for each fish species, eating  
16 the game bird the clapper rail, and note also  
17 that the fish consumption rates used in the  
18 human health risk assessment make conservative  
19 assumptions that the consumption advisories are  
20 not observed.

21 This slide shows the cancer and noncancer  
22 risk calculated by the human health risk  
23 assessment. The unacceptable excess cancer risk  
24 and noncancer hazards are shown in red. The  
25 slide also shows that the human health risk

1 assessment concluded that only the high-quantity  
2 fish consumer showed unacceptable cancer due to  
3 Aroclor-1268 and mercury.

4 The marsh trespasser coming into contact  
5 with the marsh sediments did not show  
6 unacceptable cancer risk and noncancer hazard.  
7 Noncancer hazards due to mercury and  
8 Aroclor-1268 were unacceptable for all the  
9 high-quantity and recreational finfish consumers  
10 and most of the shellfish and clapper rail  
11 consumer age groups.

12 It should be noted that the risk and  
13 hazard indices shown here for fish consumption  
14 are likely conservative due to the established  
15 consumption advisors. The exact consumption  
16 rate of clapper rail is not known for certain.  
17 The estimates are believed to be conservative.

18 This summarizes the baseline ecological  
19 risk assessment conclusions. The Benthic  
20 Community or the small organisms that live in  
21 the sediment appear to be affected by the  
22 contaminants particularly in the Eastern Creek  
23 and LCP Ditch. Modeling and fish tissue data  
24 suggest long-term effects to fish that live in  
25 the marsh.

1           This summary of the ecological risk  
2           assessment indicates that lead and PAHs do not  
3           present unacceptable risk to wildlife receptors,  
4           but methylmercury is a risk to birds while the  
5           PCB Aroclor-1268 presents a risk to mammals.

6           Since none of the lowest-observed hazard  
7           quotients -- which is this column right here --  
8           for the red-winged blackbird, marsh rabbit,  
9           raccoon and river otter are above one, this is  
10          just minimal risk to these. The green heron was  
11          most at risk. The hazard quotient here is a  
12          range of about 3.5 to 10.6. Only the green  
13          heron has a hazard quotient above one. Note  
14          that the areas of concern are primarily the LCP  
15          Ditch and the Eastern Creek.

16          The remedial action objectives will come  
17          up in a moment. They are to -- they're all up  
18          now -- reduce releases of hazardous substance  
19          from the smaller contaminated creeks to Purvis  
20          Creek, reduce contaminate exposures to  
21          fish-eating birds and animals in the marsh,  
22          reduce risk to contaminated sediments -- from  
23          contaminated sediments to bottom-living  
24          organisms, reduce finfish exposure from  
25          ingestion of contaminated prey, and prevent

1 human exposure through ingestion of finfish,  
2 shellfish contaminated above protected levels,  
3 and finally to restore surface water quality.  
4 That's the objective of the remedial action  
5 proposed.

6 Since the risk assessment showed  
7 unacceptable risk under some scenarios the  
8 objectives of the feasibility study was to  
9 identify the technologies to clean up the marsh  
10 sediment.

11 The identified technologies were further  
12 screened and evaluated. This process ended up  
13 with a detailed evaluation of the remedial  
14 alternatives.

15 The six alternatives, other than the no  
16 action alternative -- the five alternatives  
17 other than the no action alternative were  
18 retained in the feasibility study ranging from  
19 complete removal of the contaminated sediments  
20 to a combination of sediment removal, capping,  
21 and thin-layer covering.

22 This side shows all six retained  
23 alternatives. Alternatives 2 and 3 are based on  
24 remediation of the lower end of the Benthic  
25 cleanup goals. The larger remediation deals

1 with the lower end of the cleanup goals for the  
2 mud-living organisms. Alternatives 4 and 5 are  
3 based on the higher end of the Benthic cleanup  
4 goals.

5 Alternative 6 is based on remediation of  
6 the 24 acres which are the higher end of the  
7 goals of the Benthic cleanup goals plus segments  
8 of Purvis Creek and the marsh flats in Domain 1.

9 All alternatives will include long-term  
10 monitoring and fish and -- monitoring of  
11 sediment and fish and institutional controls.

12 Nine criteria were used to evaluate the  
13 cleanup alternatives and select the preferred  
14 remedy. Of the nine protection of human health  
15 and the environment and in compliance with the  
16 laws and regulations are threshold requirements  
17 which must be met by the remedial alternatives.

18 EPA then evaluates the alternatives for  
19 long-term effectiveness and permanence;  
20 reduction of toxicity, mobility, and volume  
21 through treatment; short-term effectiveness;  
22 implementability; cost and then compares and  
23 balances them.

24 State and community concerns are modified  
25 criteria that may cause EPA to modify the

1 preferred alternative or select another  
2 alternative. There currently exists a limited  
3 number of technologies available for the cleanup  
4 of contaminated sediment sites. Included among  
5 them is dredging.

6 This slide shows one of the types of  
7 dredging for removal of contained sediments.  
8 The main advantages with dredging are one, less  
9 uncertainty about the long-term cleanup; two, no  
10 need to predict cap stability; three, quicker  
11 reduction of risk.

12 The disadvantages are one, implementation  
13 and effectiveness may be a challenge due to the  
14 narrowness of the creek; two, the  
15 recontamination of the marsh through the  
16 resuspension of sediment in dredging; three, the  
17 traffic created by the need to transport the  
18 contaminated sediment; and four, disruption to  
19 the marsh ecosystem.

20 This next slide shows another -- a graphic  
21 that shows the resuspension and release of  
22 contaminants in the water and to the sediment as  
23 a result of dredging.

24 A couple of caps are shown on this slide.  
25 The main advantage of caps is that one, they

1 quickly reduce exposure to fish or other  
2 organisms with less material handling; two, the  
3 potential for recontaminate suspension is  
4 minimized; three, no need to ship sediment to a  
5 landfill.

6 The main disadvantage is that the  
7 contaminants could once again be exposed if the  
8 cap is disturbed, and this next slide is an  
9 example of probably a large-scale dredging -- I  
10 mean cap operation.

11 As far as thin-layer cover is concerned  
12 the main advantage is accelerated natural  
13 recovery by mixing of sediment of relatively low  
14 concentrations of contaminants with clean  
15 sediment. The disadvantage is that there's  
16 currently limited demonstration at other sites.

17 This is just a site that we are required  
18 to compare it against, the no-action alternative  
19 which is if things are left as they are now.

20 Alternative 2 addresses the lower end of  
21 the range of contaminates for protection of the  
22 bottom-living organisms in 48 acres, and by the  
23 way the cost and time to implement are shown on  
24 each of the following slides at 48 acres.

25 This alternative combines sediment removal

1 with institutional controls and long-term  
2 monitoring. The estimated in-place sediment  
3 removal is about 153,000 cubic yards. Following  
4 removal the sediment -- the remedial areas would  
5 be backfilled with clean material to establish a  
6 clean sediment surface.

7 Alternative 3 addresses the same 48 acres  
8 as Alternative 2 by combining sediment removal  
9 plus backfill, sediment capping, and thin-cover  
10 placement with institutional control and  
11 long-term monitoring. The estimated in-place  
12 sediment volume targeted for removal in  
13 Alternative 2 is approximately 27,000 cubic  
14 yards. Alternative 3 also includes 16 acres of  
15 capping and 23 acres of thin-cover placement.

16 Alternative 4 addresses the higher end of  
17 the range for protection of the bottom-living  
18 organisms in 18 acres by combining sediment  
19 removal plus backfill with institutional  
20 controls and long-term monitoring. The  
21 estimated sediment volume targeted for removal  
22 in Alternative 4 is approximately 57,000 cubic  
23 yards.

24 Similar to Alternative 2 following removal  
25 the remedial areas would be backfilled with

1 clean material to manage risks associated with  
2 post-removal residuals and accelerate the  
3 natural recovery process and establish a clean  
4 sediment surface.

5 Alternative 5 addresses the same 18 acres  
6 as Alternative 2 by combining sediment removal  
7 plus backfill, sediment capping, and thin-cover  
8 placement along with institutional controls and  
9 long-term monitoring.

10 The estimated sediment volume targeted for  
11 removal in Alternative 5 amounts to  
12 approximately 22,000 cubic yards. Alternative 5  
13 also includes three acres of capping and eight  
14 acres of thin-cover placement.

15 Alternative 6 addresses 24 acres of  
16 remediation area by combining sediment removal  
17 plus backfill, sediment capping, and thin-cover  
18 placement along with institutional controls and  
19 long-term monitoring. The estimated sediment  
20 volume targeted for removal in this Alternative  
21 6 is approximately 22,000 cubic yards.

22 Alternative 6 also includes six acres of  
23 capping and 11 acres of thin-cover placement.

24 EPA's preferred alternative in this  
25 proposed plan and open to comment is Alternative

1           6. It involves dredging of seven acres of the  
2 LCP Ditch and Eastern Creek to a depth of 18  
3 inches and backfilling, capping of six acres of  
4 Domain 3 Creek and Purvis Creek, thin-layer  
5 capping of Dillon Duck -- what's called the  
6 Dillon Duck in Domain 1 and Domain 2; long-term  
7 monitoring including biological monitoring; and  
8 institutional controls.

9           At this point I conclude the technical  
10 portion of this presentation and move to  
11 schedule. Actually before that these are the  
12 cleanup levels proposed for protection of human  
13 health; two parts per million for mercury, three  
14 parts per million for the PCB Aroclor-1268, and  
15 for protection of the Benthic organisms or the  
16 bottom-living organisms that form the base of  
17 the food web 11 parts per million for mercury,  
18 16 parts per million for the PCB Aroclor-1268,  
19 177 parts per million for lead, and 4 for PAHs.

20           Now this is the tentative timeline. We're  
21 here at the -- on December 4th, the proposed  
22 plan public meeting. As Angela mentioned, the  
23 comment period runs through February 2nd of next  
24 year. The estimated time to conclude a record  
25 of decision is March of next year, about a

1 year's worth of working with the Department of  
2 Justice and the responsible parties in  
3 negotiating a consent decree, having the courts  
4 lodge it and enter it, and then from that --  
5 from March of '16 to March of '17 going into  
6 design and actual construction beginning in  
7 March of 2017.

8 The next slide is -- I'll leave this up.  
9 These are the contact people. That concludes my  
10 portion.

11 UNKNOWN SPEAKER: It's a public document.  
12 There's a lot of information for everyone, and I  
13 think it would really be helpful.

14 MR. JACKSON: I can e-mail it.

15 MS. MILLER: For those that are interested  
16 if you can see me after the meeting I'll be glad  
17 to take your name, or you can just e-mail Galo  
18 and say I'd like a copy of the presentation.

19 UNKNOWN SPEAKER: Can you post it on your  
20 website?

21 MR. JACKSON: I can put it in the Reading  
22 Room. Yeah, I can put it in the Reading Room.  
23 I've never done a PowerPoint, but I can turn it  
24 into Adobe and then -- yeah, yeah.

25 MS. MILLER: We can do that, and we can

1 get it put in the Reading Room. Okay, let's go  
2 ahead and open for questions and answers. Now  
3 remember if you would stand up, say your name,  
4 and spell any unusual -- and speak up so my  
5 court reporter can hear.

6 DR. LLOYD: Dr. Roger Lloyd. My question  
7 is do you have any reproducible data on the  
8 thin-cover cap in a nine to ten-foot diurnal  
9 tide situation like we have here?

10 MR. JACKSON: Well, the thin-cover cap, we  
11 put that through hydrodynamic modeling, and in  
12 the feasibility study there's an appendix that  
13 has the results of the modeling that was  
14 performed to establish the thin-cover cap should  
15 work.

16 Now keep in mind that once the thin-cover  
17 cap is applied there will be long-term  
18 monitoring going on -- periodic monitoring to  
19 see that it, indeed, is intact.

20 DR. LLOYD: But previous to now it's just  
21 modeling?

22 MR. JACKSON: Modeling and experience with  
23 other sites. There's a sediment site -- EPA  
24 website that has a number of sites where  
25 thin-cover placement has been applied. However

1           what I notice from that website is the feedback  
2           has not been received yet as to its  
3           effectiveness.

4           DR. LLOYD: Thank you.

5           MS. MILLER: For the second time, if you  
6           have several questions if you could just ask one  
7           since there's so many people here, and then  
8           we'll just come back. Yes, sir.

9           MR. DRESSEL: I'm Floyd Dressel. I live  
10          on Purvis Creek with my family, and I've been  
11          concerned through all of this. On this picture  
12          you have a cap across Purvis Creek. Why is that  
13          cap off there by itself?

14          MR. JACKSON: The design in the  
15          feasibility area is where they detected elevated  
16          Aroclor-1268. I think Purvis Creek is primarily  
17          conditions of elevated -- the PCB Aroclor-1268.

18          MR. DRESSEL: I live above this cap. What  
19          is that going to do to the flow above the cap in  
20          Purvis Creek?

21          MR. JACKSON: I might prevail on Mr. Rhon  
22          (phonetic) to -- I don't think the flow should  
23          affect it at all. He did the modeling -- the  
24          hydrodynamic modeling.

25          MR. RHON: The flow will not change

1 significantly.

2 MR. DRESSEL: Is it going to kill any of  
3 the marsh grass?

4 MR. JACKSON: The cap might, but to a  
5 fairly limited extent.

6 MR. DRESSEL: I'm at a loss. I see where  
7 others are, but there's just one cap, right?  
8 That would block or dam Purvis Creek, and I live  
9 up here.

10 MR. JACKSON: These caps are not going to  
11 be interfering with flow at all.

12 MS. MILLER: He was going to speak to the  
13 flow.

14 MR. RHON: What we did was we modeled the  
15 system with a hydrodynamic model, and we look at  
16 the scenario before we do any action -- you  
17 know, how would the system react today and how  
18 would it react -- you know, after we place a  
19 cap, and there's no significant change with  
20 respect to flow or the health and the behavior  
21 of the marsh following.

22 MS. MILLER: Yes, sir.

23 MR. HUGHES: Van Hughes. I live here in  
24 Brunswick. How thin is this thin cap, or to put  
25 it another way, how thick is it?

1 MR. JACKSON: The thin-layer cover is  
2 about six inches.

3 MR. HUGHES: So, it's only a six-inch cap,  
4 and it will stay there?

5 MR. JACKSON: It's to restrict the -- it's  
6 on the flats, not in the creeks. In the creeks  
7 they're going to be armoring to make it stay.  
8 That's where your velocities are. That's where  
9 the modeling indicated the velocities are that  
10 might erode. That's where the cap will be  
11 armored.

12 MR. HUGHES: You'll change the elevation  
13 of the marsh by only six inches?

14 MR. JACKSON: Correct, in the flats. In  
15 the flats, not the creeks.

16 MS. MILLER: Yes, ma'am, in the back.

17 MS. HUBBARD: My name is Peach Hubbard.  
18 I'm the president of the Dolphin Project. We're  
19 a nonprofit organization. There's studies of  
20 bottle-nosed dolphins in estuaries in Georgia.  
21 Dolphins are a species in their environment. We  
22 humans share this environment.

23 Dolphins eat fish, shrimp, and crab. We  
24 humans eat fish, shrimp, and crab. Dolphin  
25 Project did a study a few years ago where

1 they're found to have the highest level of the  
2 PCBs in the world, in Brunswick. The highest  
3 levels of PCBs in the world here.

4 It is documented that dolphins that live  
5 here are sick from their toxic environment. It  
6 follows that humans who eat the same food and  
7 share the same environment are also at risk.  
8 Shrimp, shellfish, and fish live in the marsh  
9 sediment absorbing these toxic chemicals.  
10 Capping the marsh will not eliminate toxic  
11 contaminants in the shrimp, shellfish, and fish,  
12 and dolphins, and if a hurricane comes and moves  
13 all those rocks and those armaments you've  
14 wasted your money.

15 UNKNOWN SPEAKER: Amen.

16 (Applause.)

17 MR. JACKSON: That's a comment we'll take.

18 MS. MILLER: Yes.

19 MS. BROWN: My name is Wendy Brown. I'm a  
20 mammal and a mother, and I agree with her  
21 because we're eating that shrimp. My question  
22 is you said institutional controls every time  
23 with the different alternatives. What does it  
24 mean? Give us an example of institutional  
25 controls.

1 MR. JACKSON: Well, one example is fish  
2 consumption advisories that are already in  
3 place. Another one is the restrictions on the  
4 use of the marsh in perpetuity. Those are the  
5 two examples that come more readily to mind.

6 MS. BROWN: Well, I assume that that has  
7 never been done yet? You said it is, but I  
8 don't see something like this visible in  
9 marshes.

10 MR. JACKSON: You're right. That's  
11 something that has to be worked on, and a record  
12 of decision will develop that.

13 MS. MILLER: Yes.

14 MS. CROOMS: My name's Lisa Crooms, and I  
15 want to know where these advisories are posted.

16 MR. JACKSON: They're state advisories.  
17 It's the State's responsibility -- they're under  
18 the state of Georgia, and they're on their web  
19 sites I believe. I've seen them myself.

20 MS. CROOMS: What web site specifically,  
21 please?

22 MR. JACKSON: I don't know off the top of  
23 my head, but I have looked at them.

24 MS. MILLER: Yes, sir.

25 MR. KYLER: I'm David Kyler with the

1 Center for a Sustainable Coast, a non-profit  
2 organization. We've been around for about 18  
3 years promoting responsible decisions that  
4 support a sustainable environment, and we're  
5 located on St. Simons but serve the entire  
6 Georgia coast.

7 I became aware of the work that the Glynn  
8 Environmental Coalition -- a study done for  
9 toxic substances and disease registry which you  
10 may now be aware of through your interactions  
11 with the coalition. I'm not sure.

12 But it's obvious from the report that the  
13 plan -- that the assessment of human health risk  
14 had a fish consumption rate that is a fraction  
15 of the rate that people have revealed through  
16 this sample commonly exhibited. So, whereas you  
17 estimated 40 meals a year, they're eating twice  
18 or three times a week which would be 100 to 150  
19 meals a year.

20 So, that being the case won't you have to  
21 completely re-evaluate the human health  
22 assessment because of the much higher rate of  
23 consumption? And other very disturbing finding  
24 of this study was an extremely high presence of  
25 PCBs in the bloodstreams of those who were

1 sampled and those who have the fish consumption  
2 characteristics.

3 MR. JACKSON: So, what -- your question  
4 was?

5 MR. KYLER: Actual consumption being two  
6 and a half to three times the rates you assumed  
7 in your health assessment.

8 MR. JACKSON: The human health risk  
9 assessment was based on -- the consumption rate  
10 was based on a study done some years ago that  
11 was site specific, and that's -- Kevin, you  
12 might be able to --

13 MR. KOPOREC: Yeah. The human health risk  
14 assessment assumed fish consumption rates based  
15 on a survey of people in this area, how much  
16 fish in the area they said they would eat if  
17 there was not a consumption advisory in place,  
18 and those were the assumptions used in the  
19 health risk assessment. It amounted to -- for  
20 the recreational fish consumption that we saw it  
21 was 26 meals per year for the adult and a  
22 corresponding number of meals -- based on each  
23 meal being about half a pound of fish per meal.

24 And then for the high-quantity fish  
25 consumer that assumed about 43 meals per year.

1 I mean, there could be people eating more fish  
2 than that but --

3 (Laughter.)

4 MR. KOPOREC: What we would say to that is  
5 there are fish consumption advisories in place  
6 because we know contaminate levels are above  
7 where we would like them to be. We all  
8 acknowledge that. So, we would recommend you  
9 follow the fish consumption advisories.

10 MR. KYLER: That doesn't answer my  
11 question. What my point was -- my question was  
12 given the consumption is at least two and a half  
13 to three times the rate you assumed, and there  
14 are already fish consumption advisories in place  
15 of certain types -- I'm not sure exactly how  
16 much they correspond with those in your study,  
17 but advisories are in place and plenty of them  
18 thanks to DNR, but will you now have to reassess  
19 human health risks because we know for a fact  
20 that consumption is two and a half to three  
21 times what you assume?

22 MR. KOPOREC: We've already triggered the  
23 need for remedial action. That was the function  
24 of the human health risk assessment. It's  
25 already been triggered.

1 UNKNOWN SPEAKER: What does trigger mean?

2 MR. JACKSON: We have already got -- we  
3 have -- EPA has legal license now to require a  
4 cleanup. It won't change anything.

5 MR. KOPOREC: That means the levels of the  
6 fish are high enough that we know there's an  
7 unacceptable risk for people that eat the fish.  
8 We already know that. The goal is to get those  
9 levels in the fish down, and the target is to  
10 hope to do that by reducing the -- you can't  
11 clean up the fish directly, of course, but if we  
12 clean up the sediment the assumption is that  
13 that will reduce the levels in the fish over  
14 time.

15 MR. KYLER: The higher risk revealed by  
16 the higher consumption does not alter the remedy  
17 or the amount of money being spent to implement  
18 a more comprehensive remedy?

19 MR. KOPOREC: Well, we'll be following --  
20 I mean, the State has fish consumption  
21 guidelines based on number of meals per week or  
22 per month, or they have a graduated approach of  
23 looking at fish consumption guidelines.

24 So, those numbers are going to stay in  
25 place, and the State, based on what data they

1 have from what they collect and from what others  
2 give them, they will adjust those guidelines to  
3 say if the levels go up or down in the fish.

4 The levels go up and down in the fish over time  
5 whether that's shellfish or finfish or whatever,  
6 but as Galo mentioned it's already triggered the  
7 need for action, and monitoring is a very  
8 important part of the remedy -- of any remedy  
9 that ends up being selected here.

10 So, we will continue to monitor both the  
11 sediment levels as well as the fish levels and  
12 talking to people, that's part of -- the State's  
13 job is to talk to people about how much fish  
14 they eat or how much fish they would eat if  
15 there weren't consumption guidelines or  
16 whatever -- or how much fish they eat even with  
17 consumption guidelines.

18 MR. KYLER: I'm looking for a succinct  
19 answer. In other words, the level of risk  
20 revealed by actual testing of human consumption  
21 is far higher than the assumed level of  
22 consumption in your human health assessment does  
23 not alter the proposed remedy which means the  
24 amount you're willing to invest and the  
25 comprehensiveness and intensity of the remedy;

1 is that correct?

2 MR. KOPOREC: Well, I'm not selecting the  
3 remedy, but if you have that comment that  
4 comment is on the record now, and that will be  
5 considered in the remedy selection as well.

6 MR. KYLER: So, it could?

7 MR. KOPOREC: Yeah, it could, it could.

8 MS. MILLER: Let's get the gentleman back  
9 there, and then you, ma'am.

10 MR. KILLIAN: I'm Bob Killian. It sounds  
11 like you're saying that the fish advisory will  
12 continue in perpetuity because DNR on behalf of  
13 assisting the State will not require Allied  
14 Chemicals and Honeywell to clean up the levels  
15 for the fish advisories; is that correct?

16 MR. JACKSON: Fish advisories --

17 MR. KILLIAN: It's just a yes or no.

18 MR. JACKSON: It probably will last many  
19 years realistically.

20 MR. KILLIAN: Why do we not clean up --

21 MR. JACKSON: Even if it were removed  
22 today -- all of it were removed today.

23 MR. KILLIAN: Sure, but why don't we start  
24 removing it all so we no longer have a fish  
25 advisory as quick as possible? I don't want

1 fish advisories to still be here when my great  
2 grandchildren are alive. I want the fish  
3 advisories to be three years, five years, ten  
4 years, but it looks like that's not even a goal.

5 (Applause.)

6 MR. KILLIAN: My question was why not?  
7 Please answer.

8 UNKNOWN SPEAKER: Why not?

9 UNKNOWN SPEAKER: Why not?

10 MR. JACKSON: Why not --

11 MR. KILLIAN: Why not clean it up? Why  
12 not clean it up so we have no more fish  
13 advisories?

14 MR. JACKSON: Keep in mind the PCBs are  
15 being removed from the majority of -- in the  
16 creeks are being removed. They're being dredged  
17 out of there.

18 MR. KILLIAN: You know that's not true.  
19 You know how widespread they are. You know that  
20 they spread out into the ocean. Why tell us  
21 something that's not true, or do you not know  
22 the truth?

23 MR. JACKSON: We can't clean up the ocean.

24 MR. KILLIAN: I understand that, but we  
25 can clean up as much of the source as possible,

1 48 acres of upland.

2 (Applause.)

3 MS. MILLER: Yes, ma'am.

4 MR. KILLIAN: Just cleaning the 48 acres  
5 does not accomplish the goal.

6 UNKNOWN SPEAKER: And it's a lot deeper  
7 than 18 inches too. We know that. It was in  
8 1990.

9 MR. JACKSON: We've got -- the remedial  
10 investigation -- the Appendix A has some  
11 vertical profiles, and the contamination drops  
12 off significantly after the first couple of  
13 inches, and it's Appendix A of the remedial  
14 investigation which is in the Reading Room.

15 MS. MILLER: Yes, ma'am.

16 MS. PURVIS: Hi. My name is Kim Purvis.  
17 I grew up here in Brunswick, Georgia and spent  
18 my teenage years in Ellis Point which is  
19 located, if you Google Map, about midway between  
20 where the creeks feed out from LCP and the  
21 Brunswick Wood Preserving Plant.

22 In that area of Ellis Point -- and this  
23 was without research, just the people that I  
24 know. Two ladies before the age of 30 diagnosed  
25 with breast cancer, myself and another young

1 lady diagnosed at the age of 40 with breast  
2 cancer, and another woman 50 years old with  
3 breast cancer on the same road in Ellis Point.  
4 These are just people that I know personally,  
5 not doing research in the area.

6 I don't recall seeing any type of public  
7 survey or invitation to come be part of the  
8 testing that took place with the residents of  
9 Sapelo Island. Is there a way for people to  
10 volunteer to be tested for these levels of PCBs  
11 and such other carcinogenic agents?

12 MR. JACKSON: As I mentioned in the early  
13 slides we -- EPA is restricted to determining  
14 nature and extent of contamination and cleanups.  
15 That's the -- what you're asking about is  
16 something that is the responsibility of the  
17 Agency for Toxic Substances and Disease  
18 Registry, and I believe they've done studies  
19 here and, in fact, a couple years ago when I  
20 first became involved with this site with LCP  
21 they were consulted through the County and  
22 ultimately the State to look for cancer  
23 clusters, and my recollection is they didn't  
24 find anything.

25 (Laughter.)

1 UNKNOWN SPEAKER: They did a study on  
2 Sapelo Island in the year 2009, and they tested  
3 several people that come up with chemical in  
4 their blood. My parents live on Sapelo. They  
5 eat seafood every other day. My family catch  
6 fish every single day. So, we're trying to  
7 figure out why weren't everyone on Sapelo aware  
8 of this study because my parents didn't know.  
9 Not only Sapelo, but Glynn County and the  
10 surrounding area.

11 MS. PURVIS: I didn't hear the answer to  
12 my -- is there a way to volunteer to be tested?

13 MR. JACKSON: I can pass that on. Now  
14 that we've got your name I can pass it on.  
15 You've got my contact information to the Agency  
16 for Toxic Substances and Disease Registry.

17 MS. MILLER: Yes, the guy in the back.

18 MR. RENNER: Jim Renner from St. Simons.  
19 I'm sure you've got a big matrix where you store  
20 the alternatives for the effectiveness of  
21 remediation meeting your goal. You haven't done  
22 any explanations here tonight. A lot of these  
23 questions are related to that. Why is the  
24 preferred alternative Alternative 6?

25 MR. JACKSON: It's explained in the

1 proposed plan summary, and there's a link to the  
2 full proposed plan which is on the web.

3 MR. RENNER: How about in a nutshell;  
4 other than low cost was the long-term  
5 effectiveness weighted heavily or --

6 MR. JACKSON: It was a matter of  
7 balancing -- balancing the marsh disturbance and  
8 removal of contaminants. We have to balance  
9 those things.

10 MR. RENNER: Minimally invasive?

11 MR. JACKSON: Well, not minimally  
12 invasive, but not taking out 48 acres which may  
13 or may not come back.

14 MS. MILLER: Yes, sir.

15 MR. LAWRENCE: First I wonder if you  
16 could --

17 MS. MILLER: Could you state your name?

18 MR. LAWRENCE: -- turn the fans down so  
19 that everybody can hear.

20 MS. MILLER: I was told earlier that it's  
21 controlled by the County, and it's after 5:00.

22 MR. LAWRENCE: Another thing --

23 MS. MILLER: Could you state your name,  
24 please?

25 MR. LAWRENCE: Larry Lawrence. I don't

1 understand these people that would feed on  
2 Sapelo -- eight, ten, whatever it was -- had the  
3 high readings of PVC.

4 MS. MILLER: PCBs.

5 MR. LAWRENCE: That water flowing from the  
6 LCP plant and all surrounding areas goes from  
7 there to Sapelo Island. That means it passes  
8 through St. Simons, Sea Island, every island you  
9 can think of between here and there. What are  
10 these people or their property going to do with  
11 a situation like this? Are they going to  
12 correct it or not?

13 In Step 3, you've got -- what is your  
14 environmental people up in Atlanta that have to  
15 do with taking care of the -- I'm sorry -- the  
16 people -- CDC or whatever it is -- disease  
17 control, are these people working on it? Are  
18 they being made aware of -- are they following  
19 step-by-step what you're doing down here to see  
20 if it's correct and at a correct enough speed.

21 MR. JACKSON: You know, we've seen very  
22 little -- other than a PowerPoint we've seen  
23 very little of the CDC, and I don't think it's  
24 been scrutinized yet. It's just been made  
25 available.

1 MR. LAWRENCE: Don't we think it should  
2 be?

3 MR. JACKSON: That's a question for CDC.

4 UNKNOWN SPEAKER: I have a question on  
5 the --

6 MS. MILLER: State your name, please.

7 MR. DRESSEL: Floyd Dressel. My question  
8 on the dredging, where will the dredge spoils  
9 go?

10 MR. JACKSON: They'll be taken --  
11 depending on the concentration of the  
12 contaminate they'll be taken to hazardous or  
13 nonhazardous landfills.

14 MR. DRESSEL: Well, that's the dry  
15 material.

16 MR. JACKSON: Right.

17 MR. DRESSEL: I understand dredging.

18 MR. JACKSON: Yes.

19 MR. DRESSEL: What's going to happen to  
20 all the water running all --

21 MR. JACKSON: The liquids will be treated,  
22 and that's in the proposed plan. I encourage  
23 everybody to use the link on the proposed plan  
24 summary. There's a link that takes you to the  
25 50-page proposed plan with all the details.

1 MR. DRESSEL: None of the water will run  
2 back into there?

3 MR. JACKSON: No. It will be treated and  
4 it will be monitored.

5 UNKNOWN SPEAKER: The whole ocean.

6 MS. MILLER: Yes, ma'am.

7 MS. KEYES: My name is Alice Keyes spelled  
8 K-e-y-e-s, and I'm associate director of One  
9 Hundred Miles. We're a conservation  
10 organization located just across the street here  
11 in Brunswick. We serve to protect and promote  
12 the Georgia coast. We really appreciate the  
13 number of people that are here, our friends and  
14 our supporters.

15 We know that there are a lot of concerns  
16 about what y'all have proposed. We also  
17 appreciate you being here. So, thank you so  
18 much for coming and starting this process of  
19 hearing our concerns and getting the LCP site  
20 cleaned up.

21 It has been way too long that this  
22 egregious violation of wildlife health, of human  
23 health has been going on. It is time we clean  
24 up the LCP Superfund site.

25 Again our office is located just across

1 the street on Gloucester. I live in Windsor  
2 Park not a mile away. This is our home. This  
3 is our community, and we have a lot of concerns  
4 for what y'all have proposed.

5 I have read the 50-page detailed summary  
6 of what you've proposed. Number one, the  
7 federal agency should provide more than 24 hours  
8 notice of information so that we as citizens can  
9 engage with you and talk to you from an informed  
10 standpoint about what you're proposing.

11 I know that you've located the material  
12 here at the Brunswick Library 24 hours ago.  
13 That's not enough time for us to absorb and  
14 inspect and get back to you guys.

15 MR. JACKSON: You've got two months  
16 actually. The public comment runs to the  
17 beginning of February.

18 MS. MILLER: Sixty days.

19 MS. KEYES: We really appreciate the  
20 extension, however we have to be able to engage  
21 with you to come up with a solution that's good  
22 for our community. Number 2, the long-term  
23 monitoring that you described in every single  
24 one of the alternatives does not include marine  
25 mammals or include terrestrial animals.

1           We have to look at things beyond water,  
2 shellfish, and fish to determine the extent of  
3 contamination and the remedy that you propose.

4           Number 3, additional studies should be  
5 conducted to determine the extent of the  
6 contamination. The Sapelo study, I understand  
7 it's beyond your purview but for public record I  
8 would like to get it in that we need additional  
9 studies to determine the extent of the  
10 contamination.

11           My last step specific to the alternative  
12 that you have proposed -- that you've selected  
13 as EPA --

14           MR. JACKSON: It's not a selected  
15 alternative yet.

16           MS. KEYES: The alternative that is  
17 preferred. Thank you for correcting my  
18 terminology. The contaminants of concern on  
19 this site will exist in the environment for a  
20 long time, and they're more harmful for wildlife  
21 and human life than many of us know. The  
22 infertility, the birth defects, the cancer, the  
23 learning disabilities, it's just a scary  
24 situation.

25           What you have proposed in Alternative 6 is

1 not enough. Capping these contaminates will not  
2 clean up the LCP Superfund site. We propose the  
3 development of another alternative that removes  
4 more sediment, cleans it up, and looks at  
5 additional treatments such a bioremediation. It  
6 doesn't have to return to its existing site. We  
7 just want the stuff cleaned out of there.

8 We would like for EPA and our potential  
9 responsible parties to work with us as citizens  
10 of this community to come up with a better  
11 solution. We know there's a better solution out  
12 there that can clean this up. It's dependant on  
13 our health, our children's health, and our  
14 health as a community in coming up with a better  
15 alternative.

16 So, we look forward to continuing this  
17 conversation with you. Again, we appreciate the  
18 extension to the public comment period, but  
19 before I sit down I want to submit for the  
20 public record a report that was released earlier  
21 this year. It's called the Dirty Dozen. It was  
22 developed by the Georgia Water Coalition, a  
23 group of over 250 organizations and businesses  
24 who identify the most outrageous situations  
25 throughout our state, the most egregious

1 pollution problems throughout our state waters.

2 The Turtle River is located in this report  
3 as one of the 12 most polluted sites in the  
4 state, and it's because of the LCP  
5 contamination. So, I'd like to submit that for  
6 public record. Again thank you so much for  
7 being here. We appreciate y'all.

8 (Applause.)

9 MS. MILLER: Yes, sir.

10 MR. BROWN: My name's Tommy Brown. I'm a  
11 wholesale crab and shrimp dealer. Can I make a  
12 fair assumption that because this is in the  
13 Sapelo area -- or Island that these things are  
14 found in Sapelo Sound as well as the other  
15 sounds, right? Would that be fair?

16 MR. JACKSON: The Sapelo was -- you  
17 know -- are you talking about sediment or fish?

18 MR. BROWN: Sediment.

19 MR. JACKSON: I don't know enough about  
20 the sediment quality in Sapelo.

21 MR. BROWN: Well, what I've seen over the  
22 last 20 years is a decline in the crabs, a  
23 decline in the fish. We built fisheries -- DNR  
24 built fisheries out there, and you can't buy  
25 fish. Crabs are no longer down there because

1 your crab will eat around the septic tank, but  
2 he won't eat in it.

3 What I propose to -- just now propose -- I  
4 got a letter back from the commissioner -- was  
5 that we open the sounds to a limited amount of  
6 trawling. He didn't like that idea. I've  
7 talked to shrimpers that said we'll take our  
8 nets off. We'll just drag drag-lines through  
9 there and get the crap out of our sounds, move  
10 it out. Like the gentleman said earlier, the 43  
11 acres ain't going to fix this. We got a major  
12 problem, I think, in all of our estuaries, and  
13 the shrimpers if y'all would call on them, they  
14 would be willing to help y'all.

15 Sure they'd like to drag the sounds for  
16 shrimp but they'll take -- they're willing -- a  
17 lot of them are willing to take the nets off and  
18 just drag the stuff out of here, and it needs to  
19 go. It really needs to go I think.

20 (Applause.)

21 MS. MILLER: Yes, sir.

22 MR. CLARK: My name is Penn Clark. I have  
23 worked with the dolphins that were in this study  
24 since 2009. I'm a volunteer. I've worked many,  
25 many weeks with NOAA, mainly Brian Palmer, and

1 as we know part of the reason we're here tonight  
2 is because of that study.

3 Now that the Government has cut back the  
4 15 percent on spending, which I agree with  
5 actually, but dolphin money has stopped. So,  
6 when you're doing your proposal on some type of  
7 long-term understanding if this is being solved  
8 or not will there be money in that proposal to  
9 have NOAA out of Charleston continue this study  
10 so that we know we're actually getting results  
11 in the fish -- because they're the ones that are  
12 testing the fish -- in the dolphins -- because  
13 they're the ones that are testing the dolphins.  
14 They're taking them out of the water. They're  
15 doing health assessments. They're spending all  
16 of their money.

17 That money is gone now. BP pays for the  
18 study of the dolphins in the Gulf of Mexico.  
19 That's it. So, if you don't propose some money  
20 for this cleanup we won't know in a year or two  
21 whether it's working or not.

22 (Applause.)

23 MS. MILLER: Yes, sir.

24 JAMES PAULIN: Good evening. My name is  
25 James Paulin. I'm a retired crabber. I just

1 heard a person in this room complain about the  
2 reduction of funds and then talk about needing  
3 more funds and asking for funds to do this with.

4 The problem is ours. We're sending these  
5 people to Washington, and they're cutting the  
6 rug right out from under us. We can't even have  
7 education. This is not right. I appreciate  
8 what y'all are doing. I too -- 48 acres don't  
9 cut it.

10 Andrews Island down here is probably chock  
11 full of this stuff because it went all the way  
12 out in that river and they dredged it and dumped  
13 it over in there, and we turned right around and  
14 poured it right back in here.

15 Have y'all looked at Andrews Island down  
16 in the depths of that of what's there? -- I know  
17 what leachates out of there. There's metals  
18 coming out of Andrews Island through the  
19 leachate, and 48 acres -- you better look at  
20 this whole darn thing.

21 I've crabbed this river. I've fished this  
22 river for 30 years or more, and I don't think  
23 y'all can do what you're trying to even say  
24 you're going to do. How did we come up with  
25 these alternatives? You're talking about

1           Alternative 6 is best. Who decided that?

2           MR. JACKSON: Well, that's what -- we're  
3           proposing that, and we explain the reasoning in  
4           the long version of the proposed plan fact  
5           sheet.

6           MR. PAULIN: Quite frankly -- you know, I  
7           don't personally have zillions of dollars, but I  
8           wish that we would extend this program out and  
9           look a little bit further because how did people  
10          up on Sapelo Island get sick from what we did  
11          down here in Brunswick? That's a long ways --  
12          you know.

13          I agree that fish travel but we've got  
14          fish -- crabs in our traps. They generally just  
15          kind of maintain themselves in this sound and  
16          these beaches. They don't like to go up to  
17          Sapelo. How do they get up there?

18          UNKNOWN SPEAKER: And all the islands in  
19          between.

20          (Laughter.)

21          MR. PAULIN: Thank you. I appreciate it.

22          (Applause.)

23          UNKNOWN SPEAKER: Instead of asking you  
24          were's the money come from let me ask you  
25          this --

1 MS. MILLER: Will you state your name,  
2 please?

3 MR. DAY: Steven Day. I live in  
4 Washington, D.C. and Jacksonville, Florida.

5 MR. JACKSON: We've been in touch, yeah.

6 MR. DAY: You and I had a conversation. I  
7 have an environmental remediation company and in  
8 partners with Golder Associates that's an 11,000  
9 person remediation company, and we're doing the  
10 Trans Canada Pipeline cleanup on PCBs right now.  
11 We know a little tiny bit about this stuff.

12 Here's a question for you. Who is here  
13 from Honeywell? Sir, you asked the question  
14 about money. This really shouldn't be taxpayer  
15 money.

16 UNKNOWN SPEAKER: That's right.

17 MR. DAY: EPA should be fining Honeywell  
18 and getting that money from Honeywell. It  
19 shouldn't be a question.

20 (Applause.)

21 MR. DAY: Sir, how much did Honeywell earn  
22 last year, fiscal year 2013?

23 MR. JACKSON: I have no idea.

24 MR. DAY: You should. It's \$3.9 billion  
25 net revenue. \$3.9 billion in gross sales. I

1 can tell you this. \$3.9 billion and you're  
2 talking about \$28 million, I would say that  
3 their attorneys in Washington are better than  
4 your attorneys because they're getting up in  
5 front of -- and their lobbyists, and where does  
6 the plan come from? Does it come from  
7 Washington, or does it come from Region 4? Did  
8 it really come from you guys, or did it come  
9 from higher up?

10 MR. JACKSON: This went to the National  
11 Remedy Review Board because it went over the \$25  
12 million threshold which meant Washington and  
13 others in the country.

14 MR. DAY: So, they sought input from the  
15 stakeholders, in this case Honeywell.

16 MR. JACKSON: And the Glynn Environmental  
17 Coalition.

18 MR. DAY: If anybody's got a calculator  
19 we're talking about \$28 million and \$3.9 billion  
20 for the revenue of 2013. That works out to  
21 .0078. That's 78-thousandths percent, okay? I  
22 mean, come on guys. You know someone ought to  
23 be talking to Honeywell, and is there no one  
24 here that works for Honeywell, and if you are do  
25 you have enough gumption to stand up and say you

1 do?

2 Come on, there has to be someone here from  
3 Honeywell. If there's no one here why are they  
4 not here?

5 UNKNOWN SPEAKER: They're not responsible.

6 MR. DAY: Can you answer that question?  
7 Why are they not here? I'm not the one should  
8 be asking the question. Can you answer that  
9 question, why are they not here.

10 UNKNOWN SPEAKER: They are here. They  
11 just don't want to be recognized.

12 MR. DAY: Can somebody from Honeywell  
13 stand up and at least tell us who you are?

14 MR. MORRIS: I'm with Honeywell.

15 MR. DAY: Are you a lawyer?

16 MR. MORRIS: I'm not a lawyer. I'm with  
17 Honeywell.

18 MR. DAY: Can you tell us why you're only  
19 willing to spend \$28 million and work with the  
20 EPA for \$28 million versus doing a complete  
21 cleanup?

22 MR. MORRIS: We have worked with EPA as  
23 have the other responsible parties. Honeywell's  
24 not the only responsible party.

25 MR. DAY: Who are the majority?

1 MR. MORRIS: And we've been working with  
2 the Agency in a cooperative manner without  
3 attorneys to follow a Superfund process in a way  
4 that Galo has described, and we're standing here  
5 ready based on 20 year's worth of scientific  
6 studies.

7 MR. DAY: Is Honeywell willing to stand up  
8 to the plate and really commit to really doing a  
9 complete cleanup rather than just piecemeal?

10 Look, I'm familiar with GE. I'm familiar  
11 with Monsanto. We know how it works, and I also  
12 live in the Washington, D.C. area. I've been  
13 there since Jimmy Carter. That tells my age,  
14 right? I went with Jimmy Carter. I had an  
15 important job. I parked people's cars and  
16 carried their briefcases.

17 So, we really understand how this happens  
18 and how influence can be gained by a quiet word  
19 in the right person's ear and a quiet word in --  
20 you know, and certain kind of government  
21 support.

22 Honeywell is a bigger power than everyone  
23 in this collective room. We need you guys to  
24 stand up and stand tall as opposed to linking  
25 and slinking in the background.

1 MR. MORRIS: We're not slinking in the  
2 background.

3 MR. DAY: Then why aren't you --

4 MR. JACKSON: This is our meeting.

5 MR. MORRIS: This is the process that is  
6 followed. I am not here to answer questions.  
7 This is not my public meeting. This is the  
8 EPA's public meeting. If you would please honor  
9 that and direct your questions to the people who  
10 are here to answer them.

11 MR. DAY: Okay.

12 UNKNOWN SPEAKER: What is your name?

13 MR. MORRIS: My name is John Morris.

14 UNKNOWN SPEAKER: Where do you live,  
15 Mr. Morris? Are you a resident of this  
16 community or in town for this meeting?

17 MR. MORRIS: No. I am in town. I come  
18 from the corporate office, and I am here because  
19 this site is important to Honeywell. We want to  
20 get this site cleaned up. We are cooperating  
21 with the Agency. We are not fighting with the  
22 Agency.

23 We are here to say that this plan is based  
24 upon sound science, and it has evaluated the  
25 risks, and we are here ready to implement the

1 plan.

2 UNKNOWN SPEAKER: Would you object to  
3 taking it to a higher level assuming that the  
4 community doesn't feel like capping is a  
5 complete answer? Would you be willing to go  
6 back to your board and say we need more revenue  
7 to get this done properly and be good corporate  
8 citizens?

9 MR. MORRIS: We are ready to encourage the  
10 public to put your comments on the record, and  
11 the process requires EPA to evaluate those  
12 comments and respond, and that's what's going to  
13 occur here, and we support that process.

14 MS. MILLER: Yes, ma'am.

15 MR. PARSHLEY: I've already been  
16 recognized. First of all I do not recognize  
17 this as a public hearing. This is a  
18 question/answer session. There's people who  
19 have prepared for a public hearing who are not  
20 participating tonight because they know the  
21 difference between a public hearing and a  
22 question and answer session.

23 At a public hearing the public comes and  
24 they put their questions on the record, and the  
25 EPA responds to them in a responsiveness

1 summary. I've got my questions in my back  
2 pocket, and that's where they're staying, in my  
3 back pocket because this is a farce.

4 You do not put an administrative record in  
5 the library -- the repository 36 hours before  
6 you come in with a court recorder and expect the  
7 public to be ready for what they've worked on  
8 for 34 years, 4 months, and 4 days.

9 UNKNOWN SPEAKER: Amen.

10 (Applause.)

11 MR. PARSHLEY: Let's end the farce and  
12 let's end what this is tonight. This is a  
13 question and answer session.

14 UNKNOWN SPEAKER: There you go.

15 MR. PARSHLEY: You need to write to our  
16 representatives and say we came to what was  
17 represented to be a public hearing and had a  
18 question and answer session. Thank you, very  
19 much.

20 (Applause.)

21 MS. MILLER: Yes, ma'am.

22 MS. CIDAR: I just have a question. My  
23 name is Kate Cidar, C-i-d-a-r. I'm a new  
24 resident to Brunswick. I'm unfortunately not  
25 new to the Superfund process. I've lived in

1 Superfund communities and have been involved  
2 with potentially responsible parties and the  
3 government as well.

4 What's interesting about this site to me  
5 and what I haven't really seen in any of the  
6 alternatives is an interim measure to break the  
7 cycle of contaminates getting into the food web.  
8 I think that even with a little bit of public  
9 health assessment that's happened and the newer  
10 information that we have about the  
11 insufficientness [sic] of that reporting and the  
12 new extent -- the scope and the scale of these  
13 impacts in the human health population it should  
14 really be, I think, both in the private and the  
15 public sector a central focus of the remediation  
16 to stabilize that aspect of the contamination  
17 going out through those pathways and affecting  
18 wildlife and human health.

19 That's something that's going to go on for  
20 a very long time, and it's something that's been  
21 going on. Why is there not a management plan in  
22 place right now? If this was a site on land  
23 there'd be a fence around it.

24 It's in the marsh, and I understand that's  
25 more tricky, but there are Superfund sites that

1 are water bodies that are settling under active  
2 water bodies under tens if not dozens of feet of  
3 water.

4 In an intertidal zone -- I mean, we live  
5 in an area with tons of historic impoundments.  
6 We see water being managed for waterfowl, for  
7 agriculture, and this site needs to be  
8 maintained similarly to keep in those  
9 contaminants from getting into the next  
10 generation of people who live here.

11 So, where has that been? In what  
12 alternative does that management step occur?

13 MR. JACKSON: Well, the removal did remove  
14 39,000 tons of contaminated sediment, and as we  
15 saw in a couple of slides it has dropped. It  
16 has brought the concentrations down  
17 dramatically, but as far as isolating this,  
18 yeah, you're right. There is no alternative for  
19 something like that. That would be a good  
20 comment.

21 MS. CIDAR: My decision would be as an  
22 environmental planner to introduce, and  
23 hopefully stabilizing the site in that way will  
24 allow you to actually do more removal and less  
25 capping.

1           Of course with the ultimate -- I'm  
2           standing next to One Hundred Miles, so I have to  
3           say with the ultimate goal of fully restored  
4           ecological salt marsh, but it's not functioning  
5           right now. It's functioning as a vector for  
6           negative health impacts, so an interim step.

7           MR. JACKSON: Right.

8           (Applause.)

9           MS. MILLER: Yes, sir.

10          UNKNOWN SPEAKER: I'm curious about  
11          mercury. Can you quantify how much mercury was  
12          discharged, where and when, how much has been  
13          recovered? I ran across an article in the  
14          Atlanta Constitution a couple days ago. Back in  
15          1993 they reported 35 pounds of mercury that was  
16          released over a five-day period.

17          We know mercury is a real heavy metal. It  
18          likes to sink down low. So, it's probably not  
19          going to be sitting on the top 18 inches of  
20          marsh. It's probably sunk down deep. What  
21          types of mercury were discharged? Was it solid  
22          metal --

23          MR. JACKSON: It was methyl mercury.

24          UNKNOWN SPEAKER: Is that soluble form or  
25          what?

1           MR. JACKSON: The discharge was elemental  
2 mercury, but in the marsh it methylates, but  
3 only -- I may have mentioned too quickly that  
4 only a tiny fraction has methylated. As far as  
5 volume and mass of mercury there are estimates  
6 that I have in the record. I know I can come up  
7 with those.

8           UNKNOWN SPEAKER: Can you estimate how  
9 much mercury is left in the 28 acres that you  
10 want to dredge given the concentrations that you  
11 said, 12 milligrams per kilogram?

12          MR. JACKSON: Yeah, you probably could.

13          UNKNOWN SPEAKER: Can we get a figure on  
14 how much was emitted, how much was left, how  
15 much was recovered, and where else the rest of  
16 the mercury might have gone? I'm just curious  
17 because it didn't go anywhere. It didn't  
18 disappear. It's out there.

19          MR. JACKSON: I agree with you.

20          UNKNOWN SPEAKER: Thank you.

21          MS. MILLER: Yes, sir.

22          MR. MCEWEN: My name is John Mcewen. You  
23 in your 54-page report -- of which 20 percent is  
24 forms and pictures -- you do make extreme use of  
25 a hydrodynamic model. It's not footnoted. Its

1 design, its authorship, or anything else is  
2 nowhere referenced in that report. Googling  
3 produces no result. That report needs to be  
4 there. That model needs to be challenged.

5 MR. JACKSON: Again I would remind you  
6 that you we have set up an electronic -- EPA has  
7 set up an electronic Reading Room. All you have  
8 to do is Google LCP Chemicals Electronic Reading  
9 Room, and the report you're looking for is  
10 there -- a couple of drafts and, in fact, those  
11 drafts have all -- the risk assessments have  
12 been there for multiple years now. Starting  
13 shortly after I got involved with the site --

14 MR. MCEWEN: I'm asking about the model.

15 MR. JACKSON: I'll get there. You look  
16 there, and that modeling is there in the  
17 feasibility study. Look for feasibility study.  
18 It's there.

19 MR. MCEWEN: As I understand it the  
20 feasibility study wasn't delivered until 36  
21 hours ago.

22 MR. JACKSON: There are drafts of it there  
23 with substantially the same thing. Remember  
24 you've got two months left.

25 MS. MILLER: Yes.

1           WENDY BROWN: Coffin Park is right next to  
2 the marsh. Are you familiar where Coffin Park  
3 is? Are you?

4           UNKNOWN SPEAKER: Howard Coffin Park?

5           WENDY BROWN: Yes. My son was playing  
6 soccer. A lot of sports are taking place in  
7 that area, and all of a sudden a fence came up.  
8 It was lead or chemicals there. It was in the  
9 paper. The fence went up. The fence came down.  
10 What was there? Was that residual from the  
11 marsh?

12          MR. JACKSON: I really don't know.

13          WENDY BROWN: Okay. Well it's on public  
14 record that kids were playing in that  
15 contaminated environment and my son was one. I  
16 want us to be able to be tested, and that's what  
17 I request as a citizen.

18          MR. JACKSON: Okay.

19          MS. MILLER: I just wanted to make one  
20 statement in regard to what this gentleman said.  
21 The documents were placed in the administrative  
22 record. We did not expect anybody to totally  
23 dissect it and be able to come here tonight and  
24 know it.

25          The proposed plan is so technical that EPA

1 is required to come out for a public meeting to  
2 discuss the preferred remedy, and then we have  
3 the comment period -- the 60-day comment period  
4 for you guys to digest tonight, look at the  
5 documents, and be able to comment within that 60  
6 days.

7 MR. DEFUR: Peter deFur. Did I hear you  
8 say at the beginning you would have a time for  
9 official public comment, or is just now?

10 MS. MILLER: You're talking about tonight?  
11 Yes. This is questions and comments, but the  
12 comment period does not -- I wanted to make that  
13 clear -- doesn't stop tonight. It's through  
14 February 2nd. Everything that comes in will be  
15 noted.

16 MR. DEFUR: I understand.

17 MS. MILLER: Yes, sir.

18 MR. DEFUR: My name is Peter deFur. I  
19 live in Henrico County, Virginia. I'm the  
20 president of Environmental Stewardship Concepts,  
21 a consulting firm that's been hired under a  
22 Technical Assistance Grant Program to work with  
23 the Glynn County Environmental Coalition.

24 The EPA program provides technical  
25 assistance to communities around the country so

1 that they have their own technical experts to  
2 work in this process. Essentially I work for  
3 the community. I do this work around the  
4 country for approximately 20 sites in 5  
5 different EPA regions. So, I'm very familiar  
6 with the process.

7 I appreciate the opportunity to make  
8 public comments here. I have comments on two  
9 different aspects of the proposed plan at this  
10 time. I will be working and listening to the  
11 citizens, the community, and working with GEC to  
12 determine the specific nature and manner of how  
13 my technical comments will be made public and  
14 delivered to the EPA, so that will come out in  
15 the future.

16 I have comments about the process and  
17 about the substance. The comments about the  
18 process do reflect some of the things that we've  
19 already discussed and that Daniel Parshley has  
20 mentioned. The document here is incredibly  
21 important for the community to understand how  
22 the rest of their lives will be affected by the  
23 future of this site.

24 The specific details do matter, and they  
25 will alter the outcome of how we use the river

1 and how the river continues to serve as a  
2 resource. It's a large and technical document  
3 and traditionally EPA releases the public  
4 proposed plan with enough time for the citizens  
5 to digest it before taking public comments.

6 Twenty-six hours is a fairly short time  
7 period for the public to read and digest. I  
8 would hope and expect that EPA Region 4 would  
9 follow the example and lead of their sister  
10 agency Region 10 which they are familiar with.

11 EPA in Region 10 for a very important site  
12 in the Seattle area held a series of six  
13 meetings over a period of five months including  
14 three different public meetings, one of which  
15 was officially held in Spanish.

16 I would encourage the EPA to consider that  
17 alternative, and my understanding is that when  
18 the community -- not I -- makes a request of an  
19 extension of the public comment period EPA has  
20 an obligation to honor that commitment.

21 Now as to the substance. The higher  
22 actual fish consumption rate does, in fact,  
23 affect the cleanup because if lower cleanup  
24 numbers are needed in order to accommodate a  
25 higher fish consumption rate then the remedy

1 must accommodate lower concentrations of the  
2 contaminants in the site cleanup.

3 That's just simple math, and it's a  
4 calculation that is done throughout the nation.  
5 The boundaries of the site are not clearly  
6 established as evidenced by two pieces of data.  
7 Number 1 is the dolphin data indicating that  
8 PCB-1268 -- which we know originates from the  
9 LCP site -- is found in dolphins that are both  
10 residents of the river and residents of the  
11 nearby area.

12 Second of all, the other set of data are  
13 the Sapelo Island data that we've seen  
14 indicating that again PCB-1268 is not restricted  
15 to the narrow marsh area, so I think it's  
16 incumbent upon evaluation to do a broader  
17 consideration of samples farther afield. Hence  
18 the boundaries have not been clearly  
19 established.

20 The other limitation or problem that I see  
21 with the evaluation of the site is the  
22 evaluation of the salt marsh grass itself. Salt  
23 marsh grass has multiple components, and in  
24 order to accurately understand how the  
25 contaminates are separated between the plants

1 and the sediment they have to measure all the  
2 different parts of the plants including not just  
3 the leaves but the stems and the roots as well  
4 as the rhizomes of those roots. So, those data  
5 have not been collected.

6 In addition, even though the report  
7 indicates that dioxin is a known co-contaminate  
8 and a known product of the process that occurred  
9 at the LCP site I don't find dioxin data in any  
10 of the reports. So, those data are needed.

11 It's not obvious or necessary that the  
12 dioxide is all and exclusively collocated with  
13 PCBs or mercury or PAHs or lead. The dioxins  
14 may occur in other places, and we don't know  
15 about that.

16 As to the remedies there are a couple of  
17 comments that I think need to be made, and I  
18 will elaborate on these at great detail and  
19 length. The thin-layer cap is a problem because  
20 of a couple of things, one of which was already  
21 noted here, and that is that we don't have a  
22 long experience with thin-layer caps. That is  
23 we don't have 30, 40, or 50 years. We do have a  
24 longer experience with some other remedies.

25 Second of all, we do have evidence, that

1 EPA has collected, indicating that when we  
2 remove contaminants such as PCBs from a system  
3 then the result is that the PCP contamination in  
4 the trophic system, in fish, and consequently in  
5 other animals does go down.

6 The monitoring program can go a great deal  
7 towards demonstrating that, and so the  
8 monitoring program can measure not only, quote,  
9 "fish", but also young-of-the-year fish that  
10 will be exposed to the most recent conditions,  
11 new conditions. So, they should be the first to  
12 pick up any improvement.

13 And then there are the animals that live  
14 in the sediment that also have to be monitored  
15 in multiple ways. So, these are just several of  
16 the substantive issues, and I look forward to  
17 providing detailed written comments to the EPA  
18 in the future before the end of the public  
19 comment period. I look forward to further  
20 interaction with the people of Brunswick for  
21 whom I work. Thank you, very much.

22 (Applause.)

23 MS. MILLER: Yes, sir.

24 ROGER MURRAY: Roger Murray. Just as a  
25 humble conclusion here listening to this last

1 gentlemen I think these people would be a lot  
2 more comfortable if you identified the hot spots  
3 and hauled the stuff off.

4 MR. PARSHLEY: I'm going to enter some  
5 questions into the record. DEP has to answer  
6 questions. That's what the public hearing is  
7 all about. The first question is how were the  
8 chemicals released? I know it's a proposed plan  
9 that concentrates on water and sediments. It  
10 ignores air transport.

11 My question is, is the gradient being  
12 observed across the Brunswick peninsula a result  
13 of air transport of the PCBs? We see a PCB  
14 gradient. This same gradient that we observe  
15 across the Brunswick peninsula extends toward  
16 Sapelo Island, and that is why we are seeing  
17 PCBs in seafood and people and sediments towards  
18 Sapelo Island.

19 We also see the same distribution across  
20 tidal modes going in other directions down to  
21 the Sapelo River, and so it makes -- it appears  
22 from the sediment data that has been issued with  
23 the Sapelo Island Report that there's a strong  
24 indication of air deposition. If you go into  
25 the library, Volume Number 38 goes into

1 extensive detail concerning the air releases  
2 from the plant.

3 I'd be interested if the remedial project  
4 managers have included the well-documented air  
5 releases into their calculations of aerial  
6 distribution of PCPs across the Brunswick  
7 peninsula and the surrounding marshes.

8 My next question is how many pounds of  
9 each chemical were released, and that would be  
10 again to the soils, to the marsh, and to the  
11 air. Please identify how many pounds to the  
12 marsh will be removed of those that you've  
13 identified.

14 This is called a mass calculation. Please  
15 provide the mass calculations for the site. I  
16 could not find them in any document.

17 I'd like to reinforce Dr. deFur's comment  
18 concerning the lack of testing of the root,  
19 rhizome, and stem of the marsh grass in the LCP  
20 Marsh. Literature has documented that these  
21 bio-accumulate. A significant amount of biomass  
22 PCBs could be located in the spartina ecosystem.

23 This could greatly change the calculations  
24 and ecological risk assessment and the human  
25 health risk assessment if these were brought

1 into the calculation. Furthermore spartina  
2 genus has also been associated with the detritus  
3 of accumulating PCBs. We see no data for the  
4 detritus PCB levels. The biological matter has  
5 been ignored. This is a huge hole that we'd  
6 like the EPA to fill.

7 Who determined the physical damage for the  
8 proposed toxins in the feasibility study? What  
9 projects have the authors of the proposed  
10 options in the feasibility study completed in  
11 spartina marsh ecosystems?

12 How many companies who have been working  
13 in estuaries and marshes were consulted for the  
14 estimates presented for remedial options in the  
15 feasibility study and proposed plans?

16 Please provide a list of the projects they  
17 have done and the success of those projects.  
18 What institutional controls has the EPA  
19 implemented over the past 20 years? Who  
20 conducted these institutional controls? What is  
21 the budget for these institutional controls, and  
22 what institutional controls does the EPA  
23 anticipate implementing as far as the proposed  
24 plan?

25 As part of that please describe the

1 institutional controls in detail. Who will be  
2 implementing the institutional controls, and  
3 please provide an evaluation of your last 20  
4 years of institutional controls since you've  
5 been aware of the problem for the past 20 years.  
6 I'm sure since you're going to depend on that to  
7 protect human health and welfare and to meet  
8 your regulatory-required protection of human  
9 health and the environment that's going to be  
10 very important.

11 The proposed plan lacks any monitoring  
12 plan. In particular mink are not found within  
13 the area. Mink is an apex species, and it's  
14 indigenous. So, the only conclusion can be that  
15 the dead zone for mink around the LCP site  
16 extends to where the mink population has been  
17 established.

18 Please explain in the response to the  
19 study the work that the EPA has done to identify  
20 the mink habitat and the area of reproductive  
21 failure. Please describe the frequency of  
22 testing the EPA is proposing for the marine  
23 mammal population and for the mink population,  
24 and also for the individual fish species.

25 The EPA does mention goals, but the goals

1 do not have any timeline for evaluation. It  
2 mentions evaluation, but it doesn't state what  
3 the evaluation criteria are. Please clearly  
4 state in your response to the summary what are  
5 the evaluation goals, at what date and time  
6 would those evaluations take place?

7 What are the action items the evaluation  
8 will use to determine if additional action is  
9 needed, and what will the additional actions be  
10 to meet those goals?

11 Please make those specific dates, specific  
12 goal criteria, specific evaluation criteria so  
13 we'll know how it's going to be evaluated. I  
14 will submit the rest of my comments and the peer  
15 review journal studies in support of my comments  
16 here this evening at a later date.

17 (Applause.)

18 MS. MILLER: Yes, sir.

19 MR. LAWRENCE: I moved --

20 MS. MILLER: Larry Lawrence?

21 MR. LAWRENCE: I lived out there, like, 30  
22 years. Purvis Creek was just like my back yard.  
23 I and other personnel have tested 24 hours a  
24 day, 7 days a week the contaminates going out of  
25 Purvis Creek. Allied Chemical did a wonderful

1 job while they were there.

2 I retired 25 years ago. I don't know  
3 what's happened since then, but as far as -- I'm  
4 83 years old. I have trouble. I haven't heard  
5 anybody with EPA -- as far as EPA is  
6 concerned -- when I worked for that laboratory  
7 they were on the spot all the time. They came  
8 every month, and so I told people it was  
9 probably -- I worked about two hours a day  
10 making out reports to EPA and EPD, and -- but as  
11 far as I was concerned they did a really good  
12 job.

13 That was 45 years ago. I haven't been  
14 back since then. Anyway, you'd excuse me, my  
15 age. That's where I am.

16 MS. MILLER: Thank you for your comment.  
17 Yes, ma'am.

18 LINDA STRONG: Linda Strong. Can you tell  
19 me how this plan protects the aquifer?

20 MR. JACKSON: Right now there's -- they  
21 were doing work on the caustic prime pool which  
22 is out there, and they're bringing that mix from  
23 a pH of about 11 or 12 to neutral, and it's  
24 working quite well.

25 That will immobilize the mercury because

1 at high pHs mercury becomes much more volatile  
2 as well as other heavy metals.

3 MS. MILLER: Yes, sir.

4 BOB KILLIAN: Does it give concern to DNR  
5 that Honeywell is so happy with your plan?

6 (Laughter.)

7 MR. JACKSON: I don't know how to answer  
8 that.

9 MR. KILLIAN: Does anybody from DNR have  
10 any concern about how happy Honeywell is?

11 MR. JACKSON: Not that I'm aware of.

12 MR. KILLIAN: Thank you.

13 MR. CLICK: My name is Damon Click. I  
14 guess the question I heard from a couple people  
15 is if Honeywell is putting up any of their own  
16 money to help the community, or is just  
17 government funds?

18 MR. JACKSON: Honeywell funded the removal  
19 that occurred in the 1990s. There were two  
20 on-scene coordinators here overseeing it. In  
21 fact, all the uplands removal was overseen by --  
22 the funding was done by not just Honeywell but  
23 the other responsible parties as well.

24 MR. CLICK: And for the additional  
25 remediation?

1 MR. JACKSON: It's exactly the same.

2 MR. CLICK: Also, does anyone know if  
3 there's any of our local representatives here  
4 tonight?

5 UNKNOWN SPEAKER: We can't hear you.

6 MR. CLICK: Does anyone know if there's  
7 any of our local representatives here tonight?

8 UNKNOWN SPEAKER: One city commissioner,  
9 and he's right back there.

10 MR. CLICK: One city commissioner? What's  
11 his name?

12 UNKNOWN SPEAKER: Johnny Cason.

13 MR. CLICK: Johnny Cason is here. Thank  
14 you.

15 MS. MILLER: Yes, sir.

16 MR. WOOTEN: Joel Wooten. What do you  
17 mean by long-term monitoring; 50 years, 100  
18 years, 200 years?

19 MR. JACKSON: Long term, decades, until  
20 it's determined to have met the goals.

21 MR. WOOTEN: What are the goals?

22 MR. JACKSON: There are goals for sediment  
23 concentration as well as fish tissue  
24 concentrations also, and those are prescribed by  
25 the state of Georgia regulations.

1           MR. WOOTEN: Do you know how much mercury  
2 was discharged at the Allied Chemical plant,  
3 Honeywell plant?

4           MR. JACKSON: Do I know?

5           MR. WOOTEN: Yes.

6           MR. JACKSON: I have run recent estimates,  
7 but they're -- I know the records are  
8 incomplete, but there are some records that  
9 we've been looking at.

10          MR. WOOTEN: What records are those?

11          MR. JACKSON: Generally depositions from  
12 some of the former people.

13          MR. WOOTEN: Plant manager?

14          MR. JACKSON: Correct.

15          MR. WOOTEN: Didn't he testify that over  
16 one million pounds of mercury was unaccounted  
17 for and potentially discharged?

18          MR. JACKSON: I have not read the  
19 deposition recently so I --

20          MR. WOOTEN: The one that was taken up in  
21 Jesup?

22          MR. JACKSON: Correct.

23          MR. WOOTEN: You've done testing on fish.  
24 You've done testing on herons. You've done  
25 testing on mammals, but there's been no testing

1           whatsoever on humans or substantive fishermen in  
2           the Turtle River area, the Blythe Island area,  
3           St. Simons, correct?

4           MR. JACKSON: There was an ATSDR health  
5           study done more than ten years ago. It's kind  
6           of vague in my memory.

7           MR. WOOTEN: Haven't you been working on  
8           this? That's a fairly significant --

9           MR. JACKSON: Your question is what?

10          MR. WOOTEN: Isn't this -- shouldn't this  
11          be a --

12          MR. JACKSON: Yes.

13          MR. WOOTEN: -- meeting?

14          MR. JACKSON: Yes.

15          MR. WOOTEN: Are you the person that's  
16          most informed about what's been going on?

17          MR. JACKSON: This has decades of history.  
18          I don't recall every nuance immediately.

19          MR. WOOTEN: Do you recall any testing of  
20          PCB levels and mercury levels in residents of  
21          Glynn County to see what the PCB levels or the  
22          mercury levels were that were --

23          MR. JACKSON: No, I don't. No, I don't  
24          recall.

25          MR. WOOTEN: -- in the Turtle River area?

1 MR. JACKSON: No, I don't recall.

2 MR. WOOTEN: Wouldn't that be the gold  
3 standard; to find out whether or not there's  
4 mercury in residents in that area?

5 MR. JACKSON: I would imagine so.

6 UNKNOWN SPEAKER: Agreed.

7 UNKNOWN SPEAKER: It needs to be done  
8 tomorrow.

9 MS. MILLER: I'm sorry, she had her hand  
10 up first.

11 MS. FREUND: My name is Mary Freund,  
12 F-r-e-u-n-d. In all of your removal  
13 alternatives none of them actually have any  
14 bioremediation methods, and I was just curious  
15 why you guys aren't looking at any especially to  
16 remove the PCBs.

17 We were informed at the earlier session  
18 that there might be a powder that could be  
19 applied to the sediment that would actually  
20 remove the PCBs from the environment.

21 So, my question is why is there no  
22 bioremediation being explored?

23 MR. JACKSON: Mercury does not --

24 MS. FREUND: I'm talking about PCBs.

25 MR. JACKSON: PCBs -- I think to

1 bioremediate would create difficulty.

2 MS. FREUND: So, that's your answer?

3 MR. JACKSON: Actually Mark is the  
4 sediment expert.

5 MR. SPRINGER: PCB degradation and  
6 bioremediation, people have been working on it  
7 for 20-plus years starting with the Hudson  
8 River. The primary researcher from Rensselaer  
9 is at the point where she can degrade in the  
10 laboratory some of the higher chlorinated  
11 compounds.

12 The problem, especially with 1268, is it's  
13 primarily higher chlorinated content. It's a  
14 slow process, and quite frankly we're not at the  
15 point where we can do it as a treatability.

16 We can do it in the laboratory. If you  
17 want to follow it actually Tierra Solution which  
18 is a conglomerate or coalition of responsible  
19 parties on the Passaic River site in New Jersey  
20 which is PCBs and dioxins from the Diamond  
21 Shamrock site, they proposed to do an in situ  
22 project to evaluate whether or not they could do  
23 it. That's in the works. It's being addressed.  
24 I do bioremediation of contaminants. Doing PCBs  
25 as a treatment technology, as far as I know

1 we're not there yet.

2 MS. FREUND: Thank you.

3 MR. DAY: NASA developed something for  
4 Kennedy Space Center, and we had a very special  
5 relationship -- I was in southwest Mississippi  
6 two weeks ago, and they've asked us to  
7 commercialize what they developed for caulk and  
8 paint as well and other surface PCBs. Remember  
9 most paints and caulks before 1978 had PCBs  
10 laced with chips and other things. It was kind  
11 of a miracle product really. I mean everybody  
12 thought it was a miracle. It wouldn't overheat.  
13 It wouldn't burn. It was great for transformers  
14 and other metals.

15 The only problem is Monsanto -- and I  
16 won't get into the whole history. Monsanto knew  
17 about the problems years and years and years ago  
18 back in the thirties. They didn't bother to  
19 tell anybody oops, we also made a small little  
20 problem that they didn't mention to anybody.  
21 They didn't mention it to Honeywell.

22 So, what this does, this doesn't use a bio  
23 approach. This is using something quite similar  
24 to a tree root. It's spikes that are loaded  
25 with ethenol. The spikes are sealed, driven

1 into the soil, into the marsh, into sediment,  
2 and then in the area that surrounds the spike  
3 it's like tree roots.

4 Tree roots are the most wonderful  
5 filtering system. They never get clogged, do  
6 they? Your filter at homes gets clogged. Tree  
7 roots don't have that happen.

8 What happens is that the sugars in the  
9 tree root attract nutrients. It's very simple.  
10 The ethenol inside the spike attracts PCBs and  
11 absorbs PCBs. So, we take the PCB spike out and  
12 put it in a container, and off it goes for an  
13 EPA-approved disposal location.

14 We put some more spikes down and keep  
15 doing that until there are no PCBs left or  
16 they're down to an acceptable level. The reason  
17 you don't know about this is that it's new.  
18 It's been researched, and it's been working in  
19 Kennedy Space Center and other locations in NASA  
20 for a while.

21 We're now working with the Trans Canada  
22 pipeline, 500 sites around the country. There's  
23 some good technologies every day. We looked at  
24 all the biologicals. I agree with you, sir.  
25 There is not really a great biological solution.

1 There is not really a great oxidizer solution.

2 You have to change the molecule of the  
3 chlorine that's in the PCB to change it to make  
4 it more inert. It's not as easy as it sounds  
5 because PCBs are very complicated compounds, but  
6 we actually remove the PCBs rather than trying  
7 to change them.

8 We have some other things that are being  
9 developed now. They kind of have to be removed  
10 to do that. It's not something we can just  
11 sprinkle on the earth and expect it to work. It  
12 really has to be concentrated, and then we can  
13 remove it.

14 I hope that answers your question. This  
15 is something new that's been developed by NASA,  
16 but they're scientists. They're pretty smart.  
17 I'm not a scientist. I'm just a non-achiever.

18 Anyway I do respect what they've done, and  
19 we're very excited about what they're doing and  
20 what they've developed for us. Thank you.

21 MS. MILLER: Let me ask you something.  
22 We've got about five minutes left. If you had a  
23 magic wand -- and maybe it's not a fair question  
24 to ask tonight. If you had a magic wand what  
25 would you want to be done?

1 UNKNOWN SPEAKER: Clean up the entire  
2 area.

3 UNKNOWN SPEAKER: Completely.

4 MS. MILLER: For the record.

5 UNKNOWN SPEAKER: You'd have to determine  
6 the extent of the contamination for the area and  
7 see more testing of the human population. I  
8 think a lot of people raised that point tonight.  
9 I don't want to say EPA was insensitive, but in  
10 that regard I think it was insensitive -- you  
11 know, when we're talking about people's health.

12 MS. MILLER: Right, and we need ATSDR for  
13 that too.

14 UNKNOWN SPEAKER: I guess that leads me to  
15 a question. How much contamination would have  
16 to be present for the EPA then to decide to get  
17 another agency involved on their own instead of  
18 having the people in the community be the one  
19 that drives that?

20 It's not that we shouldn't drive it, but  
21 when does the EPA decide to drive it?

22 MR. JACKSON: I've not been confronted  
23 with that.

24 MS. MILLER: Yes, ma'am.

25 UNKNOWN SPEAKER: With my magic wand I

1 would waive it and y'all would have -- y'all  
2 would work with Honeywell and the other  
3 potential responsible parties to come up with a  
4 management plan as a short-term solution to stop  
5 the pollutants from continuing to get out into  
6 our system and spreading through however far,  
7 and then during that time the funds come in and  
8 you actually remove the contaminated sediment as  
9 much as possible -- as much as financially can  
10 be done, and then after that you actually put in  
11 the plants and restore the system to the best  
12 extent possible, but I do think you have to have  
13 a management plan.

14 It's 20 years and you don't have a  
15 management plan that's cutting off the  
16 pollutants from entering the system continually.  
17 I think we've got to have that.

18 MS. MILLER: Thank you for your comment.  
19 Mr. deFur?

20 MR. DEFUR: Peter deFur again. I have a  
21 process question, what Steve commented on and a  
22 comment that I made -- and I will be making --  
23 that has to do with alternative methods,  
24 technologies, or equipment that is not in the  
25 proposed plan and has to be considered in the

1 feasibility study.

2 This method was not available at the time  
3 the feasibility study was begun. I know that  
4 EPA will always take every serious comment into  
5 consideration. So, I'm confirming that you will  
6 take these suggestions into consideration and  
7 upon demonstration with empirical data that they  
8 work will EPA be able to include them in the  
9 record of decision and how does that happen?

10 Will you have to go back out for a public  
11 comment period with a new component of the  
12 remedy that includes, for example, Steve's  
13 method or the one that Joe has talked about, or  
14 one that I'm going to explain to you? Do you  
15 have to start over? Can you include that even  
16 though it's not been part of the feasibility  
17 study.

18 MS. MILLER: From what I understand if  
19 there is a significant change to the remedy we  
20 have to start over.

21 MR. DEFUR: All over or do you simply have  
22 to take it out to public hearing?

23 MR. JACKSON: I have not thought that  
24 through. I'm not sure. I'd have to get back to  
25 you on it.

1 MS. MILLER: We would have to go --

2 MR. DEFUR: I know you'd have to have  
3 another public component to it.

4 MR. JACKSON: It's starting another  
5 feasibility study.

6 MS. MILLER: Okay, one more question or  
7 comment. Yes, ma'am.

8 UNKNOWN SPEAKER: I would just like to  
9 comment that I think there should more health  
10 risk assessment and testing of the residents in  
11 the area -- all of the area, and I think that  
12 the fish consumption advisories should be more  
13 prevalent. I bought a fishing license this  
14 year. No one said a word to me about what I  
15 should and shouldn't eat or how much and how  
16 often I should and should not eat that fish.

17 (Applause.)

18 MS. MILLER: Yes, sir.

19 MR. BROWN: Carl Brown. Dealing with the  
20 PCBs, the type that we're dealing with where's  
21 the toxicity level? Is this something that is  
22 more toxic than some of the other types, or is  
23 it less?

24 MR. JACKSON: Kevin, do you want to  
25 address that?

1           MR. KOPOREC: Yeah. The Arclor-1268 is  
2           the PCB compound that -- or mixture that's  
3           prevalent here that we're worried about. The  
4           testing that's been done showed it to be less --  
5           somewhat less toxic than the most toxic one that  
6           we have well-established toxicity information  
7           on -- and that's Aroclor-1254 -- and so, we used  
8           the toxicity information from 1254 to evaluate  
9           1268.

10           Even though we think it's probably less  
11           toxic we don't have enough information for its  
12           own toxicity value, but basically it's an EPA  
13           database. It's a probable human carcinogen.

14           We have some information about causing  
15           cancer, not enough human information about it  
16           causing cancer to be a known carcinogen like  
17           other compounds are, and from a non-carcinogenic  
18           toxicity standpoint at higher exposure levels  
19           it's been shown to cause immune system problems  
20           and other effects on the blood system, effects  
21           on the central nervous system sometimes.

22           So, things like that could happen at  
23           higher exposure levels. That's where we're at  
24           with that.

25           MS. MILLER: We're going go have to wrap

1           it up tonight. Again the comment period is  
2           extended to February the 2nd. You can e-mail  
3           it. You can mail it. You can call me. I'll  
4           type it up. I'll submit it, but I want to thank  
5           you personally for coming out tonight to the  
6           meeting. I understand this is your community,  
7           and you know it best. So, thank you so much for  
8           coming.

9                       (Meeting concluded at 8:00 p.m.)

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CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA:

COUNTY OF GLYNN:

I, hereby certify that the foregoing transcript was reported as stated in the caption and was reduced to writing by me; that the foregoing 89 pages represent a true, correct, and complete transcript of the proceeding held on Thursday, December 4, 2014.

I certify that I am not disqualified for a relationship of interest under O.C.G.A. 9-11-28(c); I am a Georgia Certified Court Reporter here as a representative of Gilbert & Jones, Inc., who was contacted by United States Environmental Protection Agency to provide court reporting services for the proceedings; I will not be taking these proceedings under any contract that is prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board; and by the attached disclosure form I confirm that neither I nor Gilbert & Jones, Inc., are a party to a contract prohibited by O.C.G.A. 15-14-37(a) and (b) or Article 7.C. of the Rules and Regulations of the Board.

This 10th day of December, 2014.

*Barbara J. Prindle*

BARBARA J. PRINDLE, Certified Court Reporter, 2471



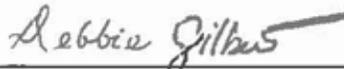
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## 1 DISCLOSURE OF NO CONTRACT

2 I, Debbie Gilbert, do hereby disclose pursuant  
3 to Article 10.B of the Rules and Regulations of the  
4 Board of Court Reporting of the Judicial Council of  
5 Georgia that Gilbert & Jones, Inc., was contacted by  
6 United States Environmental Protection Agency to  
7 provide court reporting services for these  
8 proceedings, and there is no contract that is  
9 prohibited by O.C.G.A. 15-14-37(a) and (b) or Article  
10 7.C. of the Rules and Regulations of the Board for  
11 the taking of these proceedings.

12 There is no contract to provide reporting  
13 services between Gilbert & Jones, Inc., or any person  
14 with whom Gilbert & Jones, Inc., has a principal and  
15 agency relationship nor any attorney at law in this  
16 action, party to this action, party having a  
17 financial interest in this action, or agent for an  
18 attorney at law in this action, party to this action,  
19 or party having a financial interest in this action.  
20 Any and all financial arrangements beyond our usual  
21 and customary rates have been disclosed and offered  
22 to all parties.

23 This 19th day of December, 2014

24 

25 \_\_\_\_\_  
Debbie Gilbert  
FIRM REPRESENTATIVE  
Gilbert & Jones, Inc.