



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8960

April 25, 2016

Mr. Prashant Gupta  
Honeywell International  
(sent via email)

**SUBJECT: Extension of Disposal Date Requirement in Administrative Settlement Agreement and Order on Consent, Docket # CERCLA-04-2008-3769  
LCP-Holtrachem Superfund Site**

Dear Mr. Gupta:

On May 20, 2008, the U. S. Environmental Protection Agency, Honeywell International Inc., and International Paper (IP) entered into an Administrative Settlement Agreement and Order on Consent ("Settlement Agreement") for Removal Action, Docket Number: CERCLA-04-2008-3769. The Settlement Agreement was for the action to remove Waste Water Treatment Solids (WWTS) contaminated with polychlorinated biphenyl (PCB) Aroclor 1268 from IP Cell No. 2. The purpose of this letter is to grant an extension for the disposal date of WWTS located in engineered stockpiles on the Holtrachem property, pursuant to paragraph 16.q.iii of the Settlement Agreement.

CH2M Hill documented the removal action in a Removal Action Report, dated October 2009. Between May 2008 and January 2009, a total of 19,167 in-place cubic yards (yd<sup>3</sup>) of WWTS containing PCB Aroclor-1268 at concentrations greater than or equal to 50 milligrams per kilogram (mg/kg) were transported from IP Cell No. 2 and placed in the two engineered stockpiles on the Holtrachem property. The engineered stockpiles consisted of sheets of 40-mil high-density polyethylene (HDPE) liners that were seamed together by a licensed contractor. Due to the immediate availability of the liner material, 60-mil HDPE sheeting was used for construction of the bottom liner of Engineered Stockpile #1, rather than the 40-mil sheeting material specified in the WWTS Management Plan.

Paragraph 16.q of the Settlement Agreement set forth time frame requirements for permanent disposal of the WWTS. Paragraph 16.q.iii states:

*If for any reason, the WWTS are located in the temporary stockpile cell on the Holtrachem Property more than 5 years after the Effective Date of this Settlement Agreement, then Respondents shall provide for the permanent, final disposal of the WWTS at a proper off-Site disposal facility, in accordance with the provisions of Paragraph 23. Either Respondent may request that EPA extend the time period during which the WWTS may remain in the temporary stockpile cell on the Holtrachem Property. EPA may grant an extension if it determines that the Respondent requesting an extension is working in good faith with EPA towards selection and implementation of a final cleanup for soils at the Site and that allowing the WWTS to remain in the temporary stockpile cell would not pose an unreasonable threat of release to the environment.*

In October 2012, EPA changed the requirement in paragraph 16.q.iii from five years to eight years from the Effective Date of the Settlement Agreement.

A locked fence secures the Holtrachem property and personnel are present at the site at least four days a week. Honeywell's contractors inspect the stockpiles at least once a week and submit inspection reports to EPA each week. On January 28, 2016, Walker Jones, of AMEC Foster Wheeler, emailed photographs to me documenting the current condition of the engineered stockpiles.

Honeywell has been working in good faith with EPA towards completion of the Remedial Investigation and Feasibility Study, which will lead towards selection and implementation of a final cleanup for the site. Allowing the WWTS to remain in the temporary stockpile cells does not currently pose an unreasonable threat of release to the environment. Currently, EPA is reviewing Honeywell's revised Feasibility Study and is planning to issue a Record of Decision (ROD) for the site in 2016.

Based on the above, as well as the current estimated timeframes for completing the Feasibility Study, finalizing the ROD, entering into a Consent Decree and completing the Remedial Design, I approve changing the time requirement in paragraph 16.q.iii to 12 years from the Effective Date of the Settlement Agreement, which would be May 8, 2020.

If you have any questions, I can be reached at 404-562-8760 or 404-909-0839.

Sincerely,



Samantha Urquhart-Foster  
Remedial Project Manager

cc: David Mattison, NCDENR  
Walker Jones, AMEC