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To: Miller.Scott@epamail.epa.gov
Cc: Mitch.Brouman@TRMI.Biz; "Chip McChesney"; Helton, Kelsey; John Mousa; "Wolfson, Timothy C."; Council, Greg; John F (Westford) Rice; Steve Zeiner; Weaver, Alissa
Subject: Revised Gainesville Off-Site Sampling Locations.
Date: Monday, November 21, 2011 12:00:44 PM
Attachments: [Revised Figures - Proposed Sampling Locations 21Nov2011.pdf](#)

Dear Scott,

As you know, we have been attempting for several weeks now to schedule a conference call between Beazer, EPA and FDEP to discuss the possibility of using an ISM sampling approach for the collection of dioxin/furan samples during the next round of off-Site sampling at the Cabot/Carbon site in Gainesville (Site). As you also know, Beazer had hoped to be in the field collecting this next round of off-Site soil samples perhaps as early as November. Given that it now appears the soonest an ISM sampling call may take place is early December, and it remains uncertain whether the outcome of that call will be agreement on whether and how to implement an ISM sampling approach, this email is forwarding to you three figures that show proposed off-Site sampling locations (one figure each for arsenic, PAHs and dioxins/furans) and one figure showing the general areas from which additional residential busy street background samples will be collected.

Several of the sampling locations shown on the three off-Site sampling figures have been revised from those shown on the figures attached to the August 31, 2011 additional off-Site sampling plan, based on discussions with EPA that we understand also reflect comments received by EPA from other stakeholders.

In addition, if suitable locations can be found in the three additional residential busy street background sampling areas identified on the background sampling figure to the east and southeast of the one-mile radius from the Site, one to two residential busy street background samples will be collected from each of these areas instead of all such samples being collected along University Avenue (as currently indicated on the enclosed background sampling figure). The final decision to collect residential busy street background samples from these areas will be made in the field following reconnaissance of the areas to ensure their suitability as locations representative of conditions along NW 6th Street near the Site.

At your suggestion, we also evaluated potential residential busy street background locations along NW 6th Street and have identified one portion southwest of the Site that may be suitable for collection of residential busy street background samples. This area is located inside the one-mile radius of the Site but more than half a mile distant from the Site. We have been unable to identify any other areas along NW 6th Street that are suitable for the background study. Third-party reviewers of data derived from samples taken within the identified area might incorrectly assert that the area has been subject to a Site influence and is not representative of true background. Accordingly, Beazer would prefer to not collect additional background samples anywhere along NW 6th Street, unless EPA is prepared to defend the choice of location by stating that potential Site influence does not extend to this area, and that samples collected at that distance from the Site are representative of true background.

At this time, Beazer proposes to collect all of these samples as surface soil (0-6 inch below ground surface) grab samples using the same approach and methods as employed in previous rounds of off-Site sampling. The attached figures identify several "contingent" sampling locations (designated as blue circles). Surface soil from those locations will not be collected during the initial field effort. If the concentration at a sample from which surface soil is collected (designated as green circles) exceeds delineation criteria, Beazer will remobilize the field team and collect the associated contingent sample.

Beazer remains open to implementing a practical and cost-effective ISM sampling approach for the collection of off-Site dioxin/furan samples during this next sampling event. However, Beazer is concerned that stakeholders will not be able to reach agreement on all aspects of an ISM approach by early December. Absent agreement by the first week of December, this next round of sampling would be delayed to the first quarter of 2012, which is substantially later than Beazer had anticipated and is also later than most stakeholders and the community in the vicinity of the Site had been expecting.

Thus, to ensure that this next round of off-Site sampling is implemented in 2011, Beazer is requesting that EPA approve the proposed locations shown on the attached figures with the understanding that the samples will be collected using the grab sampling approach used during previous field efforts and that sample collection will occur in December 2011. If Beazer and EPA can reach agreement on a practical and cost effective ISM sampling approach by the first week of December, Beazer can provide EPA with updated figures reflecting an ISM sampling approach and a schedule to implement an ISM sampling approach by mid-December.

Please call or email if you would like to discuss the proposed locations or need additional information.

Best regards,

Paul Anderson

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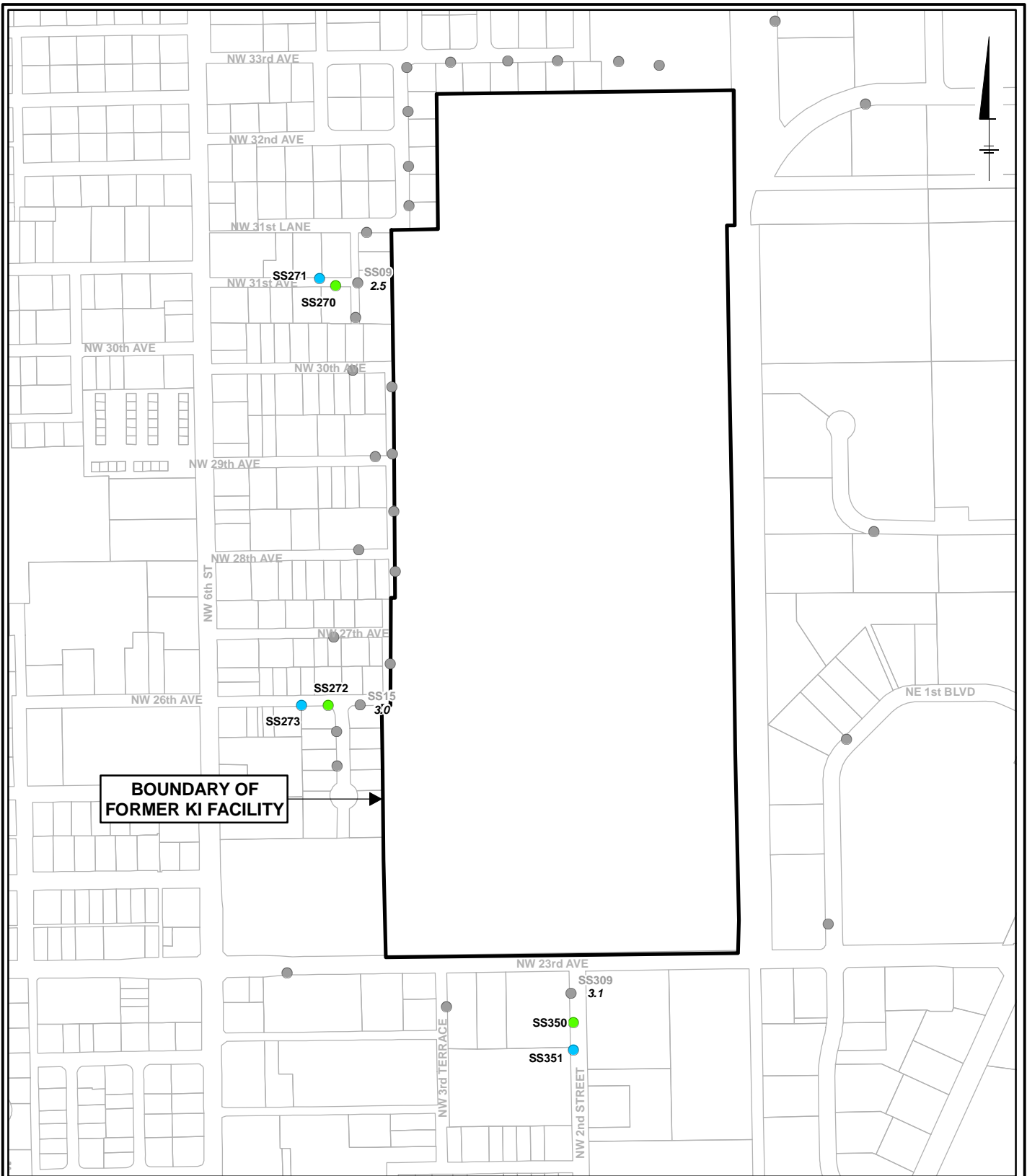
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LEGEND:

- PROPOSED ARSENIC SAMPLE
- PROPOSED CONTINGENT ARSENIC SAMPLE
- EXISTING SOIL SAMPLE LOCATION
(CONCENTRATION AT THAT LOCATION SHOWN IN ITALICS IN MG/KG)

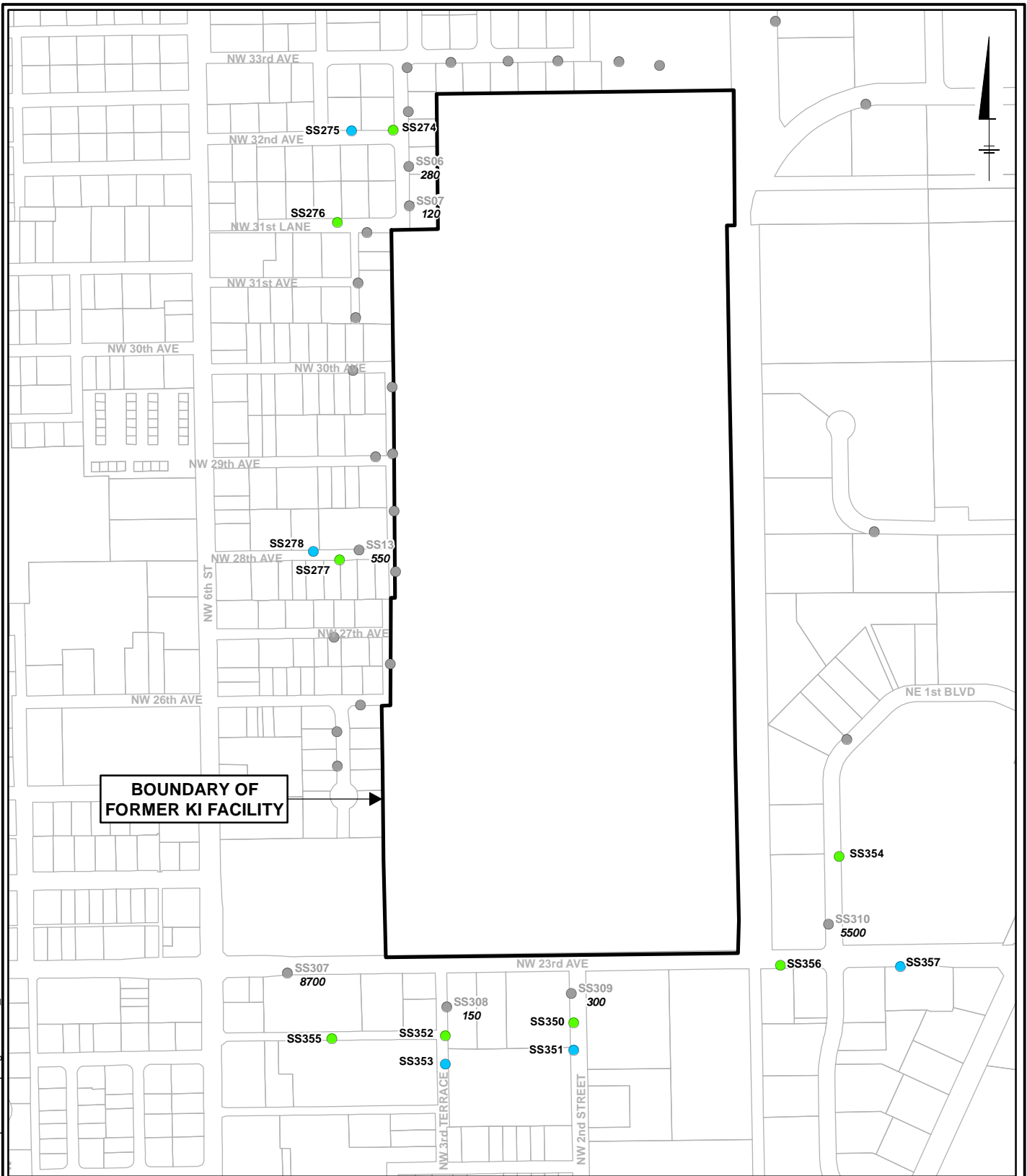


CABOT CARBON/KOPPERS SUPERFUND SITE
 GAINESVILLE, FL

OFF-SITE SAMPLING - 2011
ADDITIONAL PROPOSED SAMPLING LOCATIONS:
ARSENIC



FIGURE
1



**BOUNDARY OF
FORMER KI FACILITY**

LEGEND:

- PROPOSED PAH SAMPLE
- PROPOSED CONTINGENT PAH SAMPLE
- EXISTING SOIL SAMPLE LOCATION
(CONCENTRATION AT THAT LOCATION SHOWN IN ITALICS IN MG/KG)



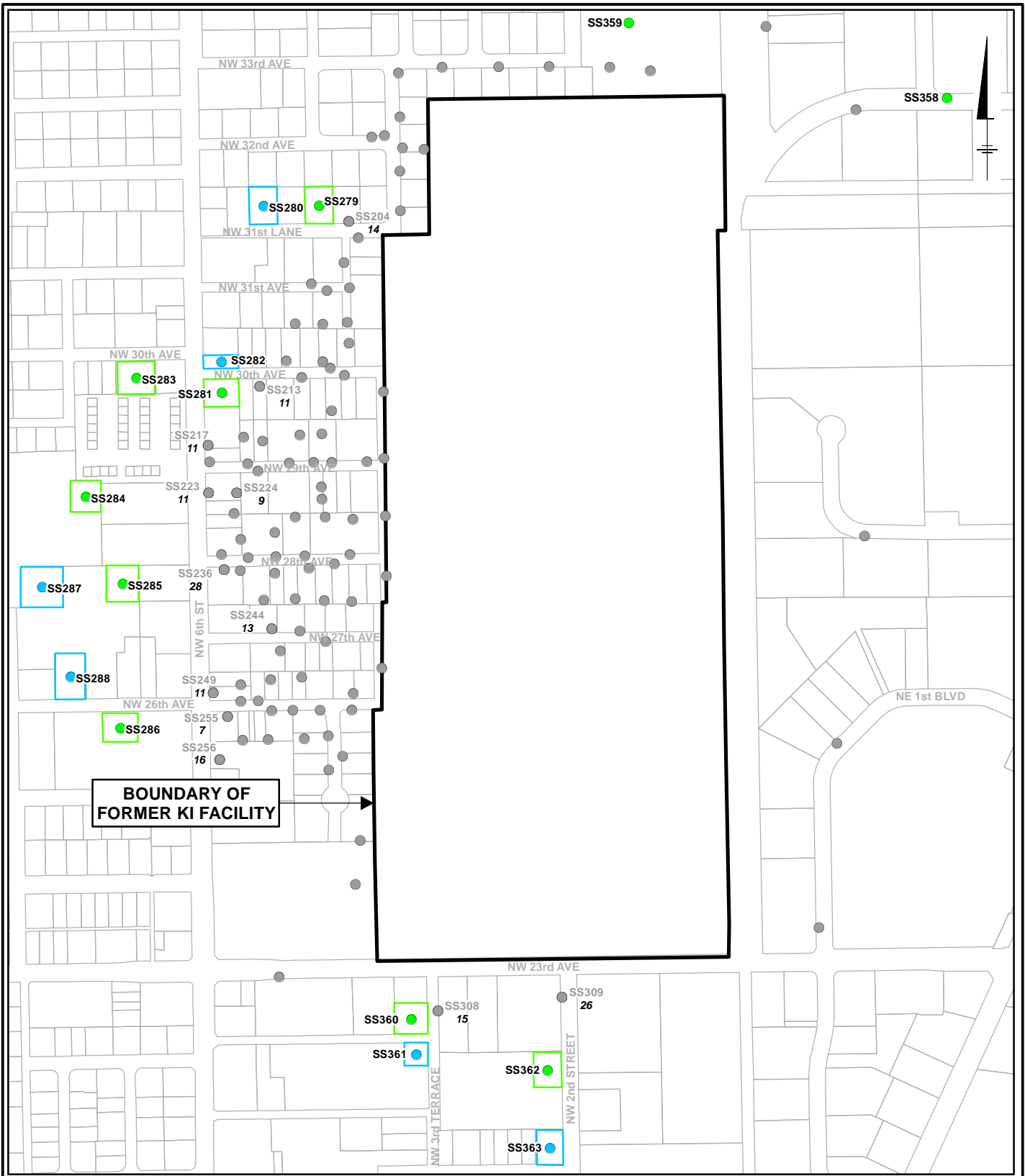
CABOT CARBON/KOPPERS SUPERFUND SITE
GAINESVILLE, FL

**OFF-SITE SAMPLING - 2011
ADDITIONAL PROPOSED
SAMPLING LOCATIONS:
PAH**



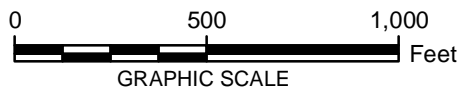
FIGURE
2

City: SYR Div/Group: SED Created By: K.SINSABAUGH Last Saved By: jrapp
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LEGEND:

- EXISTING SOIL SAMPLE LOCATION
(CONCENTRATION AT THAT LOCATION
SHOWN IN ITALICS IN NG/KG)
- PROPOSED DIOXIN/FURAN SAMPLE
- PROPOSED CONTINGENT DIOXIN/FURAN SAMPLE

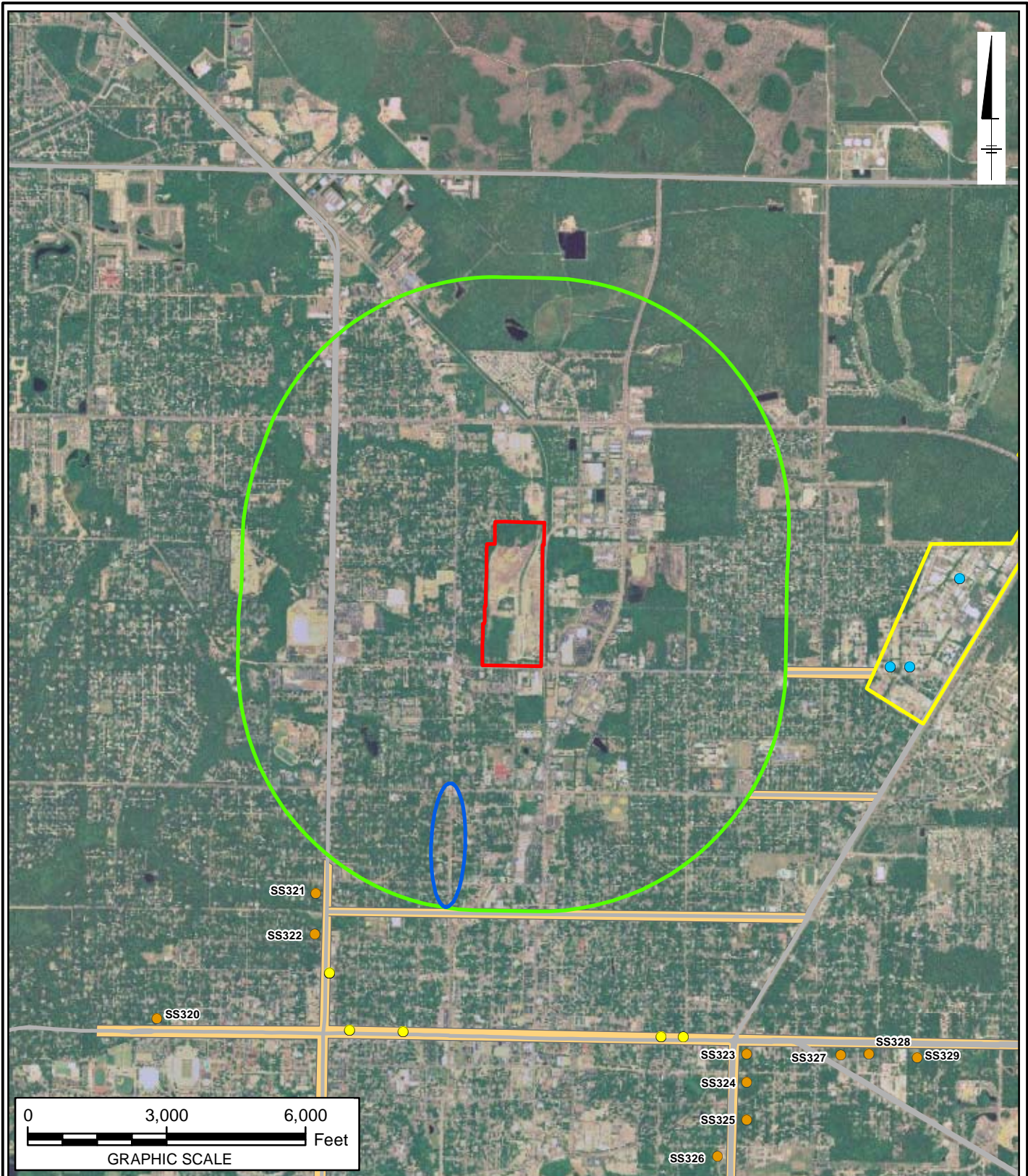


CABOT CARBON/KOPPERS SUPERFUND SITE
 GAINESVILLE, FL

OFF-SITE SAMPLING - 2011
ADDITIONAL PROPOSED
SAMPLING LOCATIONS:
DIOXINS/FURANS



FIGURE
3



LEGEND:

- 2010 BACKGROUND INDUSTRIAL SOIL SAMPLE LOCATION
- PROPOSED BUSY STREET BACKGROUND SAMPLE
- 2010 BACKGROUND BUSY STREET SOIL SAMPLE LOCATION
- BUSY STREET
- PROPERTY BOUNDARY
- ONE MILE SITE RADIUS
- PROPOSED RESIDENTIAL BUSY STREET BACKGROUND SAMPLING AREA
- PROPOSED INDUSTRIAL BACKGROUND SAMPLING AREA
- POTENTIAL NW 6TH STREET SAMPLING AREA

CABOT CARBON/KOPPERS SUPERFUND SITE
 GAINESVILLE, FL

OFF-SITE SAMPLING - 2011
PROPOSED BUSY STREET
BACKGROUND SAMPLING
LOCATIONS



FIGURE
4