

**From:** [Pat Cline](#)  
**To:** ["Helton, Kelsey"](#)  
**Cc:** ["Murry, Fredrick J."](#); ["Hutton, Richard H"](#); [John Mousa](#); ["Sweigard, Kimberly A."](#); ["Mora-Applegate, Ligia"](#)  
**Subject:** RE: Kopper"s Risk Assessment and Land Use Discussion  
**Date:** Monday, March 16, 2009 10:30:04 AM  
**Attachments:** [Koppers Area Summary.pdf](#)

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Once we finalize the call, I can provide Dr. Roberts and Ligia specific page references if that is useful. Attached is a summary of the average concentration in each subarea of the site for the key risk drivers.

The remedy will likely involve some capped areas that require institutional controls. The questions primarily relate to residual concentrations of chemicals in surface soils that would remain onsite in uncapped areas.

1. Does the risk assessment adequately address assumptions for alternate future commercial industrial uses of the site or are they specific to the current Koppers operation? What impact could this have on the target cleanup levels?
2. There is discussion of potential future mixed use development of the site. How would exposure assumptions (and cleanup target levels) change for this land use?
3. Assuming soil cleanup target levels in the ROD are based on the results of the probabilistic risk assessment (see the executive summary),
  - a. Would FDEP allow subsequent redevelopment using a similar approach?
  - b. Would the residual surface soil concentrations be much different than FDEP has allowed at other commercial industrial sites?

The above general questions relate to risk assessment assumptions and their impact on the conclusions. These include factors like exposure duration and frequency, soil ingestion rates, use of distributions on toxicity values and bioavailability.

Feel free to provide any preliminary insights you may have on this assessment. Because of the schedule, major comments to EPA/AMEC should be provided quickly for their consideration when completing the FS and ROD. Although the city is interested in the most conservative criteria (e.g. residential), it is also important to understand if the criteria being used to address surface soil direct contact risks at this site using commercial industrial assumptions result in cleanup levels consistent with those used at other sites.

Please contact me if you have additional questions. I know that Dr. Roberts will be at SOT meeting this week. It may be best to try to schedule this call for some time next week (Mon-Thursday).

*Pat Cline*

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**From:** Helton, Kelsey [mailto:Kelsey.Helton@dep.state.fl.us]  
**Sent:** Friday, March 13, 2009 1:46 PM  
**To:** Pat Cline  
**Cc:** Murry, Fredrick J.; Hutton, Richard H; John Mousa; Sweigard, Kimberly A.; Mora-Applegate, Ligia  
**Subject:** RE: Kopper's Risk Assessment and Land Use Discussion

Pat- If you could provide topics/baseline questions etc to be discussed regarding Risk Assessment that would be helpful. Thanks- Kelsey

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**From:** Pat Cline [mailto:pcline@ufl.edu]  
**Sent:** Thursday, March 12, 2009 7:25 PM  
**To:** Helton, Kelsey  
**Cc:** 'Murry, Fredrick J.'; 'Hutton, Richard H'; 'John Mousa'; 'Sweigard, Kimberly A.'  
**Subject:** RE: Kopper's Risk Assessment and Land Use Discussion

It is not critical that the entire review be complete. There are some major assumptions/topics to be clarified – may be consistent with the work plan assumptions. I can provide the baseline questions and targeted factors for discussion.

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**From:** Helton, Kelsey [mailto:Kelsey.Helton@dep.state.fl.us]  
**Sent:** Thursday, March 12, 2009 5:45 PM  
**To:** Pat Cline  
**Cc:** Murry, Fredrick J.; Hutton, Richard H; John Mousa; Sweigard, Kimberly A.  
**Subject:** RE: Kopper's Risk Assessment and Land Use Discussion

Pat- I'll check with Ligia and Dr. Roberts and let you know. I'm not sure that they have completed their review.- Kelsey

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**From:** Pat Cline [mailto:pcline@ufl.edu]  
**Sent:** Thursday, March 12, 2009 5:13 PM  
**To:** Helton, Kelsey

**Cc:** 'Murry, Fredrick J.'; 'Hutton, Richard H'; 'John Mousa'; 'Sweigard, Kimberly A.'  
**Subject:** Kopper's Risk Assessment and Land Use Discussion

Kelsey

On behalf of the city, I would like to schedule a technical discussion of the Koppers Site risk assessment, hopefully to better understand implications for upcoming land use discussions and develop critical comments/questions for EPA's consideration when moving forward with the FS. We are requesting that you also include Steve Roberts and Ligia Mora-Applegate in this discussion to further clarify selected assumptions in the document.

We would like to clarify these issues quickly, to provide input to be considered for the FS (~May) and the ROD (August). In addition, the city is planning a meeting to discuss future land use of the site with Beazer and Koppers, and it seems important to be clear on the soil cleanup decision process.

Please let me know available times/dates for a conference call – or if you prefer we can provide some options for this discussion.

Thanks,

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