



February 19, 2010

Mr. Scott Miller
Remedial Project Manager
Superfund Division
Superfund Remedial Branch
Section C
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

**Re: Additional Off-Site Soil Sampling – Western Grid
Cabot Carbon/Koppers Superfund Site
Gainesville, Florida**

Dear: Mr. Miller

On behalf of Beazer Inc. (Beazer), AMEC Earth and Environmental (AMEC) is providing this summary of off-Site soil sampling results along with a proposal for the collection of additional off-Site soil samples to the west of the Cabot Carbon/Koppers Superfund Site (Site) in Gainesville, Florida.

Samples were collected in February 2009 west of the Koppers Inc. (KI) facility boundary at five locations along the fence line and at 17 locations approximately 100 feet north and west of the KII facility. In June 2009 an additional 24 samples were collected at distances ranging from approximately 150 to 300 feet west of the KII facility. In December 2009 an additional 12 samples were collected at distances ranging from approximately 250 to 500 feet west of the KI facility. Results for 2,3,7,8-tetrachlorodibenzo-p-dioxin toxic equivalents (TCDD-TEQ) for all samples analyzed to date are summarized in **Figure 1**. In the figure, locations with TCDD-TEQ results above the Florida Department of Environmental Protection (FDEP) default residential Soil Cleanup Target Level (SCTL) of 7 ng/kg are identified with red circles, and locations with results below the FDEP default SCTL are identified with green circles. TCDD-TEQ concentrations (in ng/kg) for each location are shown in the “balloon” next to the circle.

In a letter sent to the US EPA on November 16, 2009, the FDEP recommended sampling of residential properties west of the KI facility based on a 100' x 100' grid and collection of soil samples from 0 – 6” and 6 – 24” depth intervals. In a conference call on December 15, 2009, representatives of Beazer, FDEP, GeoTrans and ARCADIS discussed the scope of off-Site sampling to the west. This letter documents the general approach and procedures Beazer proposes to use to collect soil samples on residential properties to the west of the Site using the grid sampling approach.

Proposed Sample Locations

Figure 1 shows the proposed residential soil sampling locations. The locations were selected based on a 100' x 100' grid and consideration of TCDD-TEQ results from previously collected 0 – 6" samples. In locations where existing 0 – 6" samples had TCDD-TEQ below the FDEP default SCTL of 7 ng/kg, such as along NW 33rd Ave north of the KI facility, no additional samples are proposed. In locations where existing 0 – 6" samples had TCDD-TEQ above the FDEP default SCTL of 7 ng/kg, additional 0 – 6" samples are proposed based on the 100' grid spacing. Additional 0 – 6" soil samples are proposed in the locations shown as orange triangles on **Figure 1**. These proposed locations are approximate and will be adjusted as necessary in the field to avoid permanent structures, as discussed below.

In response to the FDEP's request to demonstrate vertical delineation, Beazer proposes the following approach for collection and analysis of deeper samples. Samples will be collected from both the 0 – 6" and the 6 – 24" depth interval at all proposed sampling locations. All 63 proposed 0 – 6" samples will be submitted for analysis with a standard 21-day turn-around time. At the five locations shown as blue triangles on **Figure 1**, samples from the 6 – 24" depth interval will also be submitted for laboratory analysis with a standard 21-day turn around time. Samples from the 6 – 24" depth interval from all locations shown as orange triangles will be submitted to the laboratory on hold.

The basis for this proposed approach for deeper soils is that TCDD-TEQ concentrations in soils to the west of the Site are assumed to be aerial-related. As such, concentrations, if any, are expected to be greatest in surface soils and to not extend to deeper soil intervals (i.e., 6-24"). The approach is intended to initially analyze the deeper interval from the five sample locations closest to the Site to assess this assumption. Based on the results of the initial five 6 – 24" samples, and in consultation with the US EPA, Beazer proposes to analyze up to 10 additional 6 – 24" samples to demonstrate vertical delineation (equal to approximately 20% of sampling locations).

Access to Residential Properties

Beazer intends to first contact residents where samples are proposed (**Figure 1**) by telephone to explain the purpose of the sampling and request permission to access the residential property. If residents verbally agree to grant access for sampling, Beazer will visit the residence, review the proposed sample locations and ensure sampling will be possible. Following the visit, a letter with an access agreement will be sent to the owners of individual parcels. The letter will describe the purpose and provide the expected date and duration of the sampling activities. Sampling will only be performed on residential properties where access is granted. Beazer will inform EPA of any difficulties gaining access to residential properties.

Field Verification and Sampling Procedures

Once access to the residential properties has been arranged, the proposed sample locations will be identified in the field. If a proposed sample cannot be collected due to the presence of permanent infrastructure or other obstacles, the field team will move the proposed sample

location to the nearest area within the property that can be sampled. Examples of infrastructure or conditions that would require repositioning of the sampling location include:

- buildings including houses, garages, sheds, decks, etc.;
- trees, shrubs or other permanent vegetation;
- roads, driveways, patios, sidewalks or other paved surfaces;
- fences, phone poles or any structure that may contain treated wood; and
- areas where open burning, grilling or other combustion has occurred.

The U.S. EPA, FDEP, Alachua County and City of Gainesville will be invited to review the proposed locations, and sampling will be performed once consensus is reached regarding sampling locations. Beazer requests that US EPA make arrangements to be present during all residential sampling activities.

All soil samples will be collected as discrete samples. Samples from the 0 - 6" depth interval will be collected with a hand trowel as was done in the past, and samples from the 6 - 24" depth interval may be collected using a hand auger. All field sampling activities will be performed in accordance with the procedures outlined in the Off-Site Soil Sampling Work Plan (AMEC, 2008).

Laboratory Analysis

Samples will be collected and submitted for laboratory analysis of dioxins/furans by U.S. EPA Method 1613B. All sampling and analysis activities will be performed in accordance with the Off-Site Sampling Work Plan (AMEC, 2008) and the Quality Assurance Work Plan (Environmental Standards, 2009). Samples from 0 - 6" and 6 - 24" depth interval from the blue triangle locations will be submitted for laboratory analysis following a standard 21-day turn-around time. At all proposed sampling locations with orange triangles, samples from the 0 - 6" interval will be analyzed following a standard 21-day turn-around time and samples from the 6 - 24" depth interval will be submitted to the laboratory on hold, and analyzed based on results from the first five 6 - 24" depth interval samples and consultation with US EPA.

Proposed Schedule

EPA Approval of Sampling Plan	0 Days
Scheduling	5 Days
Arrange Access to Sampling Locations	60 Days
Mobilization and Collection	15 Days
Laboratory Analysis and Data Validation	40 Days
Summary Report	15 Days

Mr. Scott Miller
February 19, 2010
Page 4

Should you have any questions or concerns, please don't hesitate to contact Mitchell Brouman of Beazer (412-208-8805).

Sincerely,

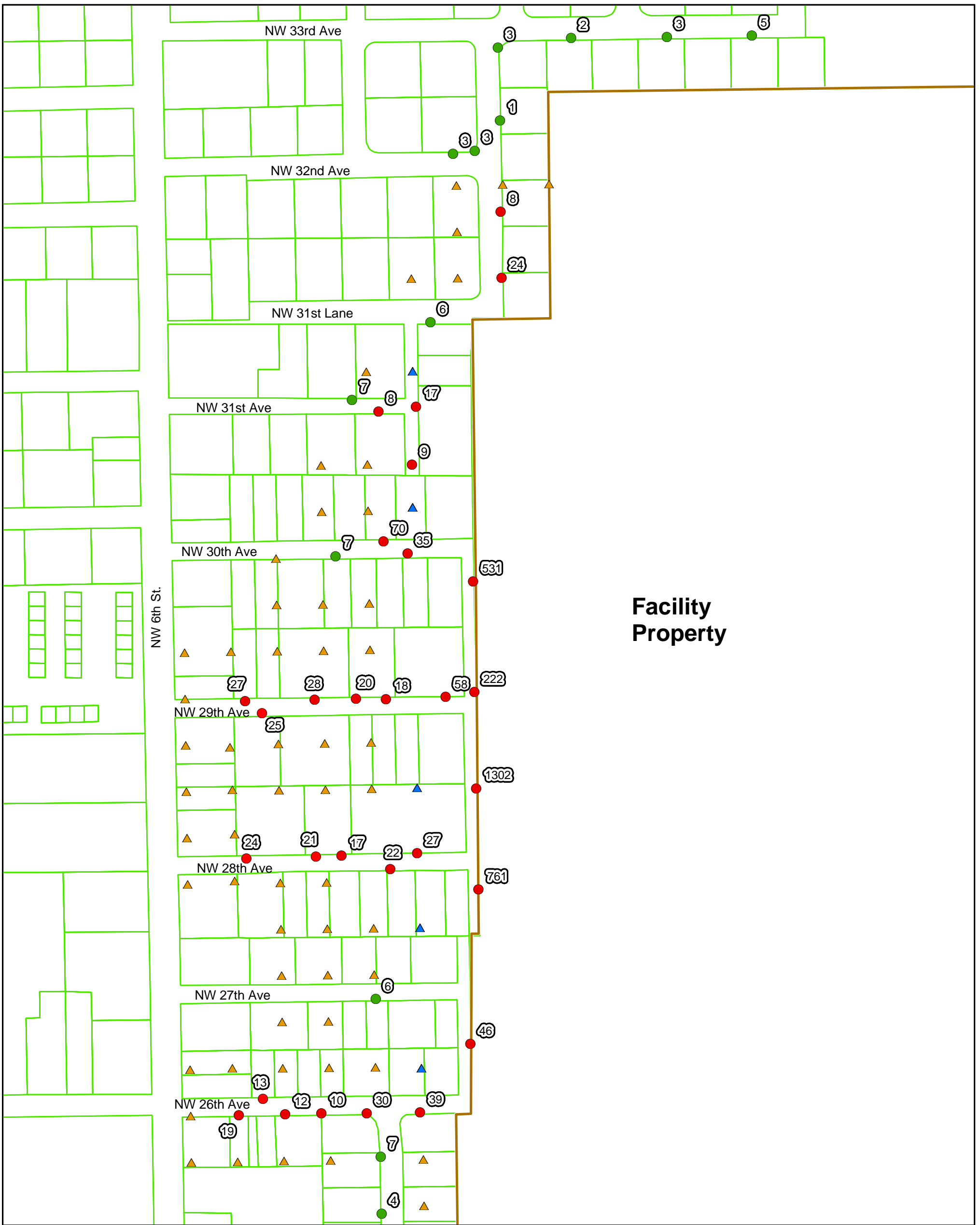
A handwritten signature in black ink, appearing to read "Joe Robb". The signature is fluid and cursive, with the first name "Joe" and last name "Robb" clearly distinguishable.

Joseph Robb, P.G.
Associate Project Manager and Hydrogeologist
AMEC Earth and Environmental

Enclosure

cc:

Mitchell Brouman, Beazer East, Inc.
Paul Anderson, ARCADIS, Inc.
Greg Council, GeoTrans, Inc.
Tim Wolfson, Babst Calland Clements & Zomnir, PC



Facility
Property

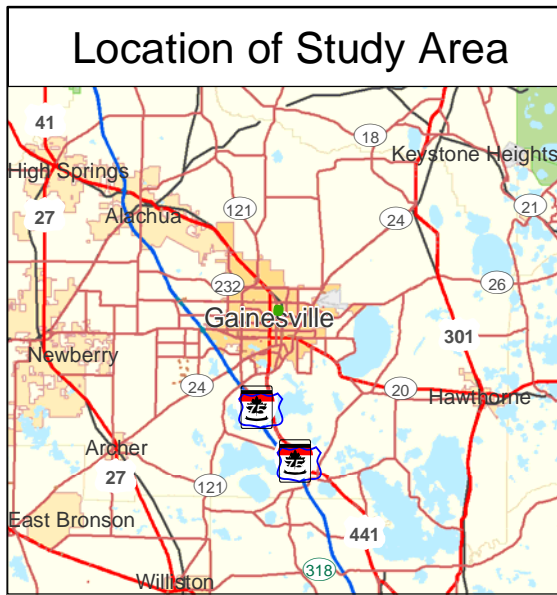


Figure 1

Proposed Off-Site
Sample Locations to the West
Cabot Carbon/Koppers
Gainesville, Florida
Beazer East, Inc.
Pittsburgh, Pennsylvania

Notes & Sources

Legend

Dioxin ng/kg

- ≤ 7
- > 7
- ▲ Proposed Sample Locations 0-6" and 6-24"
- ▲ Proposed Sample Locations 0-6" and 6-24" (deeper sample submitted to lab on hold)
- ▭ Koppers Boundary
- ▭ Parcels
- ④⑥ Sample result for 2,3,7,8 tetrachloro dibenzo(p)dioxin toxic (TCDD-TEQ) equivalent calculated using the 2005 World Health Organization toxic equivalency factors (validated)

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