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**Subject:** Fw: Beazers" proposed off-Site sampling in response to ACEPD, City and FDEP comments  
**Date:** Monday, June 08, 2009 1:43:27 PM  
**Attachments:** [ProposedSamples Off EPA060509.pdf](#)

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Folks,

This e-mail was referenced in the most recent e-mail on additional off-site soil sampling locations near Koppers in the Stephen Foster neighborhood.

Thanks,

Scott Miller

Remedial Project Manager

Superfund Division

Superfund Remedial Branch

Section C

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----- Forwarded by Scott Miller/R4/USEPA/US on 06/08/2009 01:40 PM -----

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To

Scott Miller/R4/USEPA/US@EPA

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06/05/2009 05:15

PM

"Brouman, Mitch \(\Pittsburgh\)

NA" <Mitch.Brouman@hanson.biz> ,

"Robb, Joe" <joe.robb@amec.com>

Subject

Beazers' proposed off-Site  
sampling in response to ACEPD,  
City and FDEP comments

Scott:

I am sending this email on behalf of Beazer. This email describes proposed revisions to Beazer's earlier proposed additional off-Site sampling locations. These changes are based upon a conversation I just had with Mitchell Brouman. The revisions take into account the both the ACEPD/City of Gainesville and FDEP comments on Beazer's original additional proposed sampling locations.

Mitchell indicated that Beazer is willing to collect additional samples on NW 32nd Ave. (west of SS06 and SS07), on NW 31st Ave. (west of SS09)

and on NW 26th Ave. (west of SS15). Four soil samples will be collected on each of these streets at distances of approximately 150', 200' 250' and 300' from the fenceline of the Site. (See attached figure with proposed locations.) As described before, the sample located at 200' will be analyzed first. Analysis of subsequent samples will be contingent upon the results of the 200' sample. All samples will be collected from the 0-6" interval and will be analyzed for dioxins and furans.

Beazer does not believe that additional samples need to be analyzed for PAHs or arsenic. Samples to both the north and south of SS09 and SS15 are below the arsenic SCTL. In addition the two arsenic exceedances in the 100' samples to the west of the Site are substantially lower than than the maximum background concentration of 14.5 mg/kg. In addition, the number of samples exceeding the arsenic SCTL in the background neighborhoods (1 of 18 sample locations) and in the Stephen Foster neighborhood (2 of 17) are very similar. Given the numerous sources of arsenic such as pressure treated wood fences and structures, infrequent exceedance of the SCTL should not be surprising.

Similar observations can be made regarding PAH. Samples to both the north and south of SS06/SS07 and SS13 are below the PAH SCTL suggesting further sampling to the west is not needed. In addition, some initial PAH ratio fingerprinting we have conducted indicates the sample with the highest PAH concentration (SS13) is clearly not consistent with the fenceline samples or the other 100' samples. The PAH in that sample are dominated by another source. The PAH concentration at SS13 is also inconsistent with the general PAH concentration pattern (it is about 10 times lower than the samples to its north and south) suggesting that it was caused by a source other than the Site. Additionally PAH at 1 of 18 background locations exceeded SCTLs and in the Stephen Foster neighborhood, 3 of 17 exceeded. Note too that if the high PAH sample (SS13) is removed from the 100' sample data set, the average concentration of the 100' samples drops to about 0.065 mg/kg, essentially the same as found in the background samples from the neighborhood one mile south of the Site (0.063 mg/kg). That neighborhood appeared to be the closest match to the Stephen Foster neighborhood. Based upon the above observations, Beazer does not believe that additional delineation of arsenic and PAHs west of the existing 100' samples is required.

Beazer acknowledges both the ACEPD/City of Gainesville and FDEP request that additional off-Site sampling be conducted to the East and South of the Site. Sampling to the East and South is not included in the currently proposed additional sampling effort.

Mitchell suggested that he, you and I have a call next Monday, June 8 at 1:00 PM to discuss whether the modified additional off-Site sampling effort described in this email is acceptable to U.S. EPA. If it is, AMEC could meet with interested stakeholders to finalize the sampling locations either next Tuesday afternoon or Wednesday morning and then begin sample collection immediately thereafter.

As you know, I will be on vacation next, but please call my cell phone (978-771-2825) if you have any questions. You can also call Joe Robb at 978-692-9090 or, of course, Mitchell. I will try and check emails on Monday morning, but I would also request that you give me call and provide me call-in information for the 1:00 PM call.

Best regards,

Paul

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(See attached file: ProposedSamples\_Off\_EPA060509.pdf)