CITY OF GAINESVILLE
every path starts with passion
FLORIDA

**Office of the City Manager**
PO Box 490, Station 6
Gainesville, FL 32602-0490
(352) 334-5010
(352) 334-3119 (fax)
www.cityofgainesville.org

June 28, 2010

Mr. Scott Miller
Remedial Project Manager
United States Environmental Protection Agency
Region IV, Superfund North Florida Section
61 Forsyth Street, SW
Atlanta, Georgia 30303

RE: Koppers Site – *Short Term Interim Measures Work Plan, June 2, 2010*

Dear Mr. Miller,

The City of Gainesville (COG) has reviewed the *Short Term Interim Measures Work Plan* (IMWP) prepared by GeoTrans, Inc. for Beazer East, Inc. for the Koppers portion of the Cabot Carbon/Koppers Superfund Site dated June 2, 2010. The COG has coordinated its review and comments with the Alachua County Environmental Protection Department (ACEPD).

The City is encouraged to see these initiatives by Beazer East, Inc. but has serious concerns about the inconsistency of the IMWP with a number of the Feasibility Study (FS) Remedial Alternatives. The IMWP promotes infiltration of stormwater into the site whereas several of the Remedial Alternatives direct stormwater away from the source material sites and measurably reduces the amount of infiltration to the source material areas via a capping technique. The attached memo dated June 18, 2010 presents the City of Gainesville comments on the IMWP and presents our concerns with that document for your consideration and action. We believe more discussion and data is needed to help us fully understand this disparity in the environmental objectives presented by the two documents.

If you have any questions or need additional local input for the activity please call me at 352-334-5010.

Sincerely,

Fred Murry
Assistant City Manager

Eric Bredfeldt, Planning & Development Director
John Mousa, ACEPD
Teresa Scott, Public Works Director
Jeff Martin, FDEP NE District
Greg Council, GeoTrans
Rick Hutton, GRU
Kelsey Helton, FDEP
Stu Pearson, Public Works
Mitch Brourman, Beazer East

City of Gainesville

# Memo

To: Fred Murry, Assistant City Manager
Teresa Scott, P.E., Director of Public Works

From: Stewart Pearson

Date: June 18, 2010

Re: Koppers Site - *Short Term Interim Measures Work Plan, June 2, 2010*

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The referenced document (IMWP) was submitted as a part of the documentation related to an application for a Demolition Permit for the site. The IMWP is titled *Short-Term Interim Measures Work Plan*, Koppers portion of the Cabot Carbon/Koppers Superfund Site, USEPA/FDEP Id: FLD 004 057 535, June 2, 2010. The document was prepared by GeoTrans, Inc., 1080 Holcomb Bridge Road, Building 100, Suite 190, Roswell GA 30076 for Beazer East, Inc.

During the course of the review Figure 1-9 from the Feasibility Study proved useful. The attached Figure 1-9 is excerpted from the Feasibility Study (FS), Cabot Carbon/Koppers Superfund Site, Gainesville, Florida as prepared for the U.S. Environmental Protection Agency, Region 4 and dated May 2010, Revision 0. Figure 1-9 presents Average Concentrations of soil data gathered from the upper 6 inches of the soil from across the site for; Arsenic, Benzo(A)pyrene, and Tetrachloro Dibenzo-P-Dioxin. The FS narrative explains that " The color coding used in Figure 1-9 is based on the Florida default Soil Cleanup Target Levels (SCTL) for direct exposure at a commercial/industrial Site (concentrations in green are below the default commercial industrial SCTL)." This means that the values reported with blue and red **exceed** the Florida default SCTLs.

The comments focus on the 1) Stormwater and Dust Management Improvements and 2) Decommissioning and Demolition of Remaining Structures.

**Section 2.2.2 Stormwater and Dust Management Improvements**

**Comment 1**: Figure 4 - The figure presents a proposed Conceptual Interim Erosion Control and Drainage Measures plan for most of the open area on the site. Appendix A of the document includes an engineering report that identifies the area of the Root Rake, Disc, & Seed and Mulch activity as being 36 acres. Comparison of the attached Figure 1-9 with Figure 4 concludes that this activity will occur over much of the area where the Florida default SCTLs were exceeded. The effects of the proposed activities follow:

- the root raking will blend those pollutant excesses from the top 6 inches into the soil column 12 inches to 18 inches deep depending on the aggressiveness (depth) of the activity,
- the discing will tend to spread the surface materials to different areas of the site,
- no dust control management plan is included for the 36 acre foot print,
- the document is silence on the Seed & Mulch Process requirements and post construction maintenance activities.

An inherent outcome of the proposal is that the data presented in Figure 1-9 will be rendered unreliable due to the activity. Subsequent retesting of the soil for the listed chemicals may or may not confirm the current concentrations of the listed chemicals depending on the testing protocols established for the re-sampling.

It would be prudent to examine more fully the implications of the proposed Interim Measure and its potential effect on the subsequent long term site closure activities as presented in the FS prior to authorization of the work.

Also the Health and Safety Plan (HSP) is included in Appendix C as a part of the Demolition Permit Application. Considering that the workers to perform the Interim Measures of 2.2.2 will be exposed to the pollutants identified on Figure 1-9, it would be prudent to 1) have the HSP be expanded to include the pollutants listed on Figure 1-9, 2) have the HSP moved to a more global position in the document so it has a strong relationship with all parts of the IMWP, 3) have Site specific personal protection listed for each of the chemicals of concern on the expanded list and 4) know why an Air Pathway Assessment {EPA -450/1-89-001a [Volume I – Overview of Air Pathway Assessments for Superfund Sites (Revised)]} is not discussed in the document.

If fugitive dust is generated during the described operations or in the period of post construction during the time of vegetation maturation, measurements should be taken to record the concentrations of pollutants leaving the site and, if necessary, to trigger activation of contingency plans to reduce excessive levels of pollutants becoming airborne during the construction and in the post construction period until the vegetation is mature.

Last the Seed & Mulch Process does not have an accompanying Planting Plan. The Planting Plan would normally include; seed specifications, application rates, soil amendments, watering requirements, planting success coverage criteria and replanting procedures if coverage criteria is not met, site rain gage and data logging of precipitation, provisions for irrigation if inadequate precipitation falls on the site, and other parameters judged necessary for the activity to be successful on site.

**Comment 2**: Appendix A Stormwater Discharge Permit Application and Preliminary Stormwater Design Report

The Preliminary Stormwater Design Report, June 1, 2010 (PSDR) presents in article 1.2 that the Site is currently vacant. In contrast the accompanying Form 2-f, page 2F-14, item IV, A. identifies 1.5 acres of imperviousness. Clarification is needed. The narrative describing the demolition of the buildings describes removal of the structure but in most cases the slab for the structure will remain and the site imperviousness will remain unchanged. Also in B. of the article the reviewer is unfamiliar with the meaning of the word "meed" in the second sentence.

The PSDR article 2.2, The test list seems inadequate considering the information presented in Figure 1-9, attached, that presents indications of the of the historical depositions that have occurred on the Site.

It would be prudent to have consistency between the demolition plan and the stormwater calculations about the remaining impervious surfaces on site. Also the chemicals of concern list should be expanded to include those listed on Figure 1-9.

Of major concern is the statement in Article 1.3 that " the Curve Number (CN) will be less in the Interim BMP use than it is in the existing condition." The water quantity calculations using the Rational Formula use an existing condition C value of 0.7 and a proposed condition C value of 0.3 in calculating that the peak rate of runoff from the site will decrease from 100 cubic feet second (cfs) to 35 cfs, respectively. This change represents a 65% decrease in the peak runoff from the site, if the Interim Measure in Section 2.2.2 is implemented. This change means more stormwater will be infiltrating into the soil on the site than previously. This additional ground water is in direct conflict with a number of the solutions Remedial Alternatives contained in the FS that facilitate the runoff by application of surface covers. In the case of the OnR-5X series an impervious cap is provided over an 32 acre to minimize **any** infiltration.

We are very concerned with this inconsistency and the apparent facilitation of the Interim Measure; to increase the amount of ground water in the source material areas, to aid in the further dispersion of the underground plumes of DNAPL in the surficial aquifer and other media below and to increase the hazard to Gainesville's water supply.

**2.2.3 Decommissioning and Demolition of Remaining Structures**

**Comment 3** - Article 2.2.3.3 Decontamination Containment

- The first issue of concern for the decontamination containment is the location and access route to it within the site. The narrative describes standard work process for the decontamination activity. The narrative omits any description of the criteria to locate the temporary facility and in choosing an access route for the contractor and the required equipment to access the facility safely. The concern is that there are contaminates on the site that exceed the Florida default Soil Cleanup Target Levels and the workers will be exposed to these contaminates unless the proposed demolition process is managed to minimized the potential for contact with these contaminates.

The attached Figure 1-9 presents Average Concentrations of soil data gathered from the upper 6 inches of the soil from across the site.

It would be prudent to locate the decontamination facility is a area where the STLS are not exceeded and that a route to and from the facility for each demolition site is selected to minimize the encounter with the contaminates in excess of the SCTL criteria.

- The second issue of concern is the cleanup of the decontamination containment process calls for inspection of the site for "saturation, discoloration, or other signs of leakage." If detected, the visible signs will be excavated and disposed of as hazardous waste. The narrative omits criteria specifying the additional over excavation necessary to account for a safety factor necessary for the inherently imprecise observation technique. The narrative is also silent on the decontamination of the excavation equipment used in this operation.

It would be prudent to; 1) specify an fixed distance for over excavation, and 2) specify the decontamination process for the equipment used for the process and the disposal of the generated waste material.

- The third issue of concern is in the 4th paragraph that addresses items/areas of special concern noted by FDEP. The narrative is silent on which of the items is to be transported to the decontamination containment and which are to be cleaned in situ. There is no discussion on any excavation to remove the liquid wastes that are generated in cleaning the in situ items/areas of concern.

It would be prudent to specify; 1) which items are to be transported to the decontamination containment and 2) the cleanup process for the liquid wastes from the in situ cleaned items.

- The fourth issue of concern is the absence of any contingency plan to deal with excess water accumulating in the decontamination containment from rainfall events. The demolition is scheduled to be done during the 2010 hurricane season. Extreme rain events are possible during the process. Because of this potential for excessive rain the containment area is subject to flooding 24/7 during the season. No instructions are included to describe the end-of-the-day cleaning requirements, cessation of the process in advance of an impending hurricane event or what the contractor is to do with the rain event generated water retained in the decontamination containment.

It would be prudent to specify; 1) the end-of-the-day cleaning requirements, 2) the hurricane impact response plan and 3) the management of the unexpected water retained in the decontamination containment.

**Comment 4**: Article 2.2.3.4 Demolition

- The first issue of concern is that the narrative describes 8 structures to be demolished. Attachment H referenced later in the document presents 10 buildings to be demolished via the pictures included. The document should be amended to include a site map physically locating the structures to be demolished and listing the names in the legend.

- The second issue of concern is the "Dust Management practices". The narrative describes a water truck circulating during the demolition process to spray roads, equipment tracking areas, concrete demolition and masonry breakdown operations. The narrative does not specify the desired outcome of the watering, criteria to determine the frequency of the watering, or minimum residual soil moisture content. Watering also will produce moist dirt that is likely to attach to the wheels and under carriages of the demolition vehicles used in this process. This material should be contained on site.

It would be prudent to; 1) amend the document to more fully develop the 'Dust management' by including explicit criteria and operation descriptions for the field personnel and contractors, and 2) ensure that all vehicles leaving the site are cleaned prior to entering the public right of way on their way to the point of disposal for demolition materials and the wastes generated by the process.

- The second sentence of the second paragraph needs editing for clarity.

**Comment 5**: Article 2.2.3.5 CCA Pad Closure

- The description includes a "compacted soil cover " over the CCA pad and containment area. The description omits details on the source of the soil cover and details on the dimensions to be used in completing the activity other than the depth of cover.

It would be prudent to; 1) identify the source of the fill from on-site or off site and generally characteristics (desired permeability) as well as the amount of contaminates allowed in the material, and 2) include detail drawings that set defined criteria to complete the performance of the interim capping.

**Comment 6**: Appendix C - Demolition Permit Application and Plans

Following the Work Plan Summary is a section that appears to be Health and Safety Plan. It should be titled such for clarity and it uses undefined acronyms in the text. Issues follow: 1) The chemicals of concern should include in addition to those listed, the additional chemicals listed on Figure 1-9, 2) A Site Specific Accident Response Plan should be included in the Health and Safety plan (HASP) and 3) Site Specific Personal Protection should be provided for each of the chemicals of concern.

**Comment 7**: Attachment C - Tank Removal Procedures

- The fourth paragraph describes a placement diagram for the tanks. The reviewer was unable to locate the diagram.
- The fifth paragraph describes the tank cleaning process. Absent from the description of the decontamination process is a description of how the Vac Truck is to be cleaned.
- The sixth paragraph describes the location process for holes in the containment. Driving a stake and taking reference measurements from objects outside the containment area is a more reliable method than that described.

**Comment 8**: Work Plan Documentation

The City is considering the several means and methods of being provided with adequate documentation to demonstrate that the permitted work is carried out as per the approved application materials.

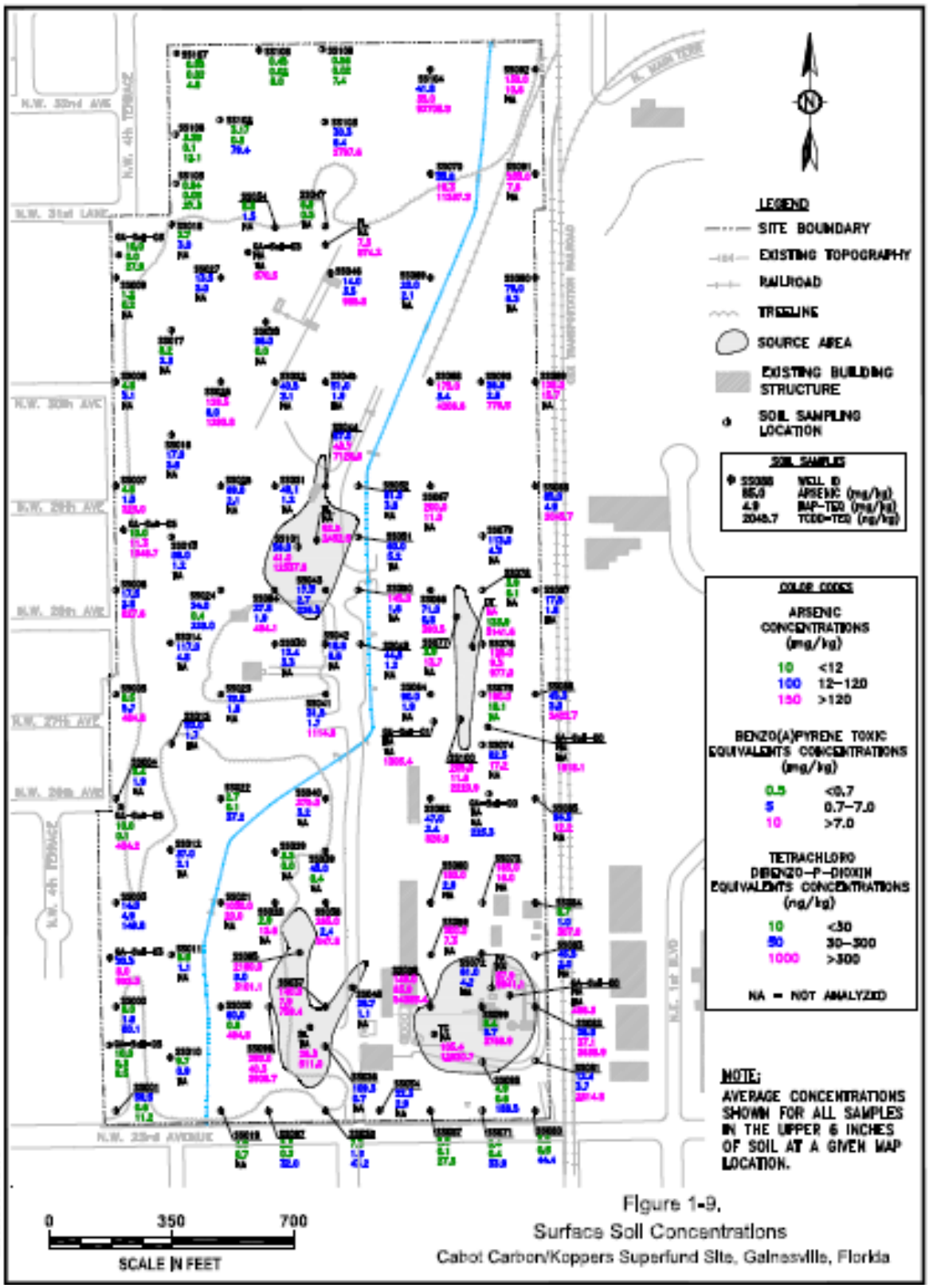


Figure 1-9.
Surface Soil Concentrations
Cabot Carbon/Koppers Superfund Site, Gainesville, Florida