

From: [Pearson, Stewart E.](#)
To: [Murry, Fredrick J.](#); [John Mousa](#); [Hutton, Richard H](#); [Dean.Williamson@CH2M.com](#);
[Anthony_Dennis@doh.state.fl.us](#); [John Herbert](#)
Subject: FW: C/K ROD clarification - FLD980709356
Date: Thursday, February 17, 2011 11:37:45 AM

Response from Scott on my email for clarification on the ROD.

From: Miller.Scott@epamail.epa.gov [Miller.Scott@epamail.epa.gov]
Sent: Thursday, February 17, 2011 10:51 AM
To: Pearson, Stewart E.
Subject: RE: C/K ROD clarification - FLD980709356

Stu,

Good morning, I understand from your e-mail of yesterday that you spoke with Greg Council and had a good discussion on pre-design efforts that are afoot for addressing the onsite soil containment area. I will answer your questions below underneath each question.

Thanks,

Scott Miller

Remedial Project Manager

Superfund Division

Superfund Remedial Branch

Section C

U.S. EPA Region 4

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From: "Pearson, Stewart E." <pearsonse@cityofgainesville.org>
To: Scott Miller/R4/USEPA/US@EPA
Cc: "Murry, Fredrick J." <murryfj@cityofgainesville.org>, "John Mousa (jjm@alachuacounty.us)" <jjm@alachuacounty.us>, "Hutton, Richard H" <HUTTONRH@gru.com>, "Anthony_Dennis@doh.state.fl.us" <Anthony_Dennis@doh.state.fl.us>, John Herbert <jrherbert1863@yahoo.com>
Date: 02/15/2011 12:00 PM
Subject: RE: C/K ROD clarification - FLD980709356

In my review of the ROD several items arose that were unclear or required comment. Could you assist in providing clarity where needed? There is also some Errata listed at the end.

1. pg 39, Item 5.1.7.1, The article is silent on the recreational users in the creek. Shouldn't this group be included? EPA used the ecological risk to determine the need for the creek cleanups. The use of

ecological risk instead of human health risk typically requires a more thorough cleanup than human health risk. Previous risk assessments showed no unacceptable health risks to humans. Think of how much more resilient a person is than a worm (macroinvertebrate).

2. pg. 105, 9.3.4. Alt OfR-4. Contextually the narrative treats all property to the west of the site as private or commercial. The cost estimate uses 90 parcels as the basis for developing the cost of the activity and neglects the land between the private property and the edge of pavement (unpaved right of way). I estimate that the additional area of the right of way at 2 acres and will cost an additional \$180,000 to remove the contaminants from the right of way based on the residential process. I assuming that if the adjoining private residential property remediation is to excavate 2 ft bls and then backfill, the adjoining right of way will have process. Is this true? Yes, the right of way that abuts the residential parcels is treated like "residential" for cleanup standard purposes.

3. pg 118, item 11.2.1.1. The 4th sentence identifies that the 'most contaminated soil' will be "treated" within the consolidated area. "Treated" is not defined and is an ambiguous term for purposes of understanding how it will reduce the volume, mobility or toxicity of the site contaminants. The soil will be covered by an engineered cap which prevents water coming into contact with it (so it reduces mobility of the contaminants within it as well as preventing exposure) and some portion of it will be solidified (which reduces mobility and toxicity) .

4. pg 119, Item 11.2.1.4, paragraph 1, last sentence. This sentence indicates the stormwater basin is to be designed for future use. Future Use (Section 6) identifies the 'initial' land use to be industrial/commercial with recreational or mixed use with a residential component as additional uses that could be added in the future. Will the RP reserve land adjacent to the initial basin to accommodate the future additional use of the land? That question is more of a design detail that may be related to future use of the Site. We will determine that as part of the remedial design process and there will be further discussion on possible site reuse between the City, public, and the Developer that has interest in redeveloping the Site.

5. pg 130, item 11.2.3.2. Sediment. The narrative focuses on the Cabot Tar Removal (Interim and Future) in its construction. The narrative is silent on Koppers responsibility or future actions by them? Both Koppers and Cabot are responsible for cleaning contamination in the creeks. EPA doesn't apportion cleanup responsibility between the two parties. They are both responsible for cleanup. Typically, responsible parties apportion cleanup amongst themselves as the law states that they are both jointly and severally liable. For instance, if Beazer East went out of business, EPA can force Cabot Carbon to remediate the entire contamination in the creeks.

6. Figure 14, Why are ISBS injection points shown on the North Lagoon and Drip Track areas? The remedy description does not include ISBS for the NL and DT areas. Figure 14 is in error. You are correct.

7. Dialogue between the local agencies and EPA on the anticipated height of Consolidation Area (CA) has been ongoing for several months. The differences of opinion are a matter of concern. The Appendix, pages 219 and 376 suggest that the CA will be 40 acres in lieu of the 32 acres presented in Figure 14. The additional size may be appropriate

considering additional delineation is needed on the PTW source areas. However the differences in height merited some conceptual modeling.

The results for the modeling show that the minimum height, including cover, for the consolidation area for the 32 and 40 acre foot prints ranges between 9 feet and 8 feet, respectively and the main slopes range between 1% and 1.2%, respectively. These results are based on the following assumptions:

Modeling on the CA mound for the 32 acre and 40 acre sizes has been performed to determine the height based on available data with the following assumptions:

- 15 ft. along the east boundary is reserved for Chemox injection
- 20+ ft of the east side of the CA is reserved for drainage conveyance for drainage from the east slope of the CA.
- The CA drains east and west from the center of the CA.
- The minimum slope of CA is equal to or greater than 1% for purposes of reducing infiltration.
- The cover for the contaminated soil in the CA is 1 foot of clean fill and 1 foot of engineered cap.
- Volume of soil from On-site, Off-site and ISS/S for the 32 acre CA is 238,440 CY as per the estimate.
- Volume of soil from On-site, Off-site and ISS/S for the 40 acre CA is 225,530 CY based on the assumption that the additional 8 acres in size reduces the On-site excavation by 4 acres.
- Swell of volume due to excavation and compaction is neglected.

8. I'm including some minor edit notes.

Errata

1. Page (pg) 37, Item 5.1.6.5, Second paragraph. The railroad spur diverts minor storm flows but is overtopped during major stormwater flow events.
2. pg 7, 13th bullet, Cabot not Beazer submitted the Tar Removal Plan
3. pg 18, 3rd Paragraph - City owned land (rights of way) are considered 'private' by the context of the narrative.
4. pg 42, Current and Future Land Use, The Murphree Well Field also supplies water to portions of Alachua County.
5. pg 96, 4th Para., UIC is Underground Injection Control. Add to acronyms.
6. pg 128, 5th Para., Define GAC = Granulated Activated Carbon. Add to acronyms

Thanks

From: Miller.Scott@epamail.epa.gov [Miller.Scott@epamail.epa.gov]
Sent: Tuesday, February 15, 2011 8:27 AM
To: wayne_reiber@cabot-corp.com; Scott, Teresa A.; John Herbert; Hutton, Richard H.; Brett P. Goodman; Gregory W. Council ; Brouman, Mitch (Pittsburgh) NA; Helton, Kelsey; John Mousa; Jim Erickson; osteen.bill@epa.gov; koporec.kevin@epa.gov; Fankulewski Joyce; Murry, Fredrick J.; Paul Linda S; Pearson, Stewart E.; Sweigard, Kimberly A.; Osteen.Bill@epamail.epa.gov; Koporec.Kevin@epamail.epa.gov; Ozulumba.Chinwe@epamail.epa.gov
Subject: Reminder: Koppers Monthly Conference Call at 1 p.m. EST, Conference Call-in number: 866-299-3188, conf. code 4045628618

Thanks!
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