

From: Miller.Scott@epamail.epa.gov
To: [John Mousa](mailto:John.Mousa)
Subject: Re: Question and Clarification on On-Site Non Consolidated Area Soils and Creek Sediment ROD Remedies
Date: Friday, February 11, 2011 1:49:58 PM

John,
Good afternoon, below your question #2 is the answer in italics.
Thanks,
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Date: 02/07/2011 09:13 AM
Subject: Question and Clarification on On-Site Non Consolidated Area Soils and Creek Sediment ROD Remedies

Scott,

In reviewing the ROD, I have some questions about two issues:

- 1) It appears that the selected remedy for the on-site soils outside of the consolidation area consists of removal of soils and hot spots in vadose zones including surficial soils that have concentrations of COCs above FDEP default leachability criteria and then covering with 2 feet of "clean" soil. If this is correct, it is not clear what criteria will be used for the "clean" soil cover. Will this "clean" soil meet the FDEP residential direct contact SCTL concentrations? In several sections of the text and in the responsiveness summary USEPA indicates that the surface soils will "in effect meet FDEP default residential clean up standards has been selected" so I am assuming that the above assumption is correct.

2) If default FDEP leachability SCTLs are to be met for the vadose zone soils prior to the addition of the "clean" soil cover, this appears to conflict with other statements in the ROD which appear to state that USEPA will meet the most stringent of the direct contact or leachability standards in the vadose zone soils. I refer you to the following sections:

1. In Section 7.1.5 Clean-up Goals--- 3rd paragraph in section states;

" Table 7 and Table8 include the both the numeric direct contact and default leachability SCTL criteria. The more stringent of the two criteria apply to the vadose zone soils."

2. On page 118 of Appendix A: Responsiveness Summary- In Response to the following FDEP Comment- DEP recommends that the AROD identify both the numeric direct contact and default leachability SCTL criteria and state that the more stringent of the two criteria will apply to the vadose zone soils.

EPA gave the following response: " EPA agrees with this approach and will include it in the ROD".

Can you explain this issue please and how these statements apply to the onsite soils outside the consolidation area.

By operation of State regulation at 62-780, a responsible party is allowed to either accept default leachability criteria or determine Site-specific leachability criteria will be evaluated during remedial design. Onsite soils outside of the consolidation area will be required to meet either the more stringent of the direct contact number for commercial standards or the default leachability/Site-specific leachability criteria in the top 2 feet of soil. Leachability criteria must be met throughout the vadose zone. I think that you may trying to envision the "how" this physically gets done.

The way it would work is that the soils outside of the consolidation area that don't meet the more stringent of the criteria will be excavated and brought back in the onsite soil consolidation area where they will be placed and an engineered cap will be constructed over them. Then clean fill that meets the default residential standards will be brought onsite and placed over both the engineered cap (containment area) and outside the containment area at a minimum depth of two feet. Obviously, it may require more fill in areas where there was excavation.

3) In the remedy for the creek sediments, the ROD in the Declaration Summary and on Page 19 indicates that sediments containing concentrations above the Probable Effects Concentrations would be excavated and then MNA would be used to see when the concentrations would reach the lower Threshold Effect Concentration level. But in Section 7.15 Clean-up goals, it is stated that FDEP default leachability standards would be used for offsite sediments in the Creeks. And in the Table 8 the only compound listed with a goal is Pentachlorophenol. This seems inconsistent to me. Pentachlorophenol was not found at all in the sediments so I don't know why it was selected on the table. And also if we are using TEC and PECs as goals for sediments in the creeks, then why are they not listed in table for all the PAH compounds that are present in the creek sediment. And doesn't

dioxin have an ecological effect concentration? Can you explain why there is a difference here and why pentachlorophenol was selected? Please provide clarification if you will as to what the clean-up goals are for the creek sediments? The FDEP TEC and PEC values to be used?

Also concerning the creek sediments, there was dioxin found in stretches of Springstead Creek above FDEP Residential SCTL at about 40 ppt in one spot. Will this level of dioxin be addressed in the creek remedy? These creeks are privately owned by neighboring residents. While FDEP did develop an alternate clean-up criteria for the creek sediments for dioxin based on the limited exposure in the creeks and that the level of dioxin found in the creek was below this alternate criteria, they nevertheless indicated that these criteria could not be enforced in the creek because the creek is privately owned by adjacent residential properties. They therefore indicated that FDEP Residential criteria for Dioxin should be met in the creeks.

Thanks for providing this clarification. We are trying to make sure we understand what EPA has selected.

John Mousa