



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

Dr. Paul D. Anderson  
Vice President/Principal Scientist  
ARCADIS U.S., Inc.  
One Executive Drive, Suite 303  
Chelmsford, MA 01824

Re: November 11, 2011, Revised Figures Gainesville Proposed Sampling Locations  
And August 31, 2011, Additional Offsite Soil Sampling Plan

Dear Dr. Anderson,

Thank you for the August 31, 2011, and November 11, 2011, e-mail submittals with proposed sampling locations for offsite soil sampling nearby the former Koppers facility in Gainesville, Florida. We appreciate your extensive efforts in discussions related to completing offsite soil sampling there. Our comments on these submittals are as follows:

**Polyaromatic Hydrocarbons (PAH) Sampling**

We support the proposed location SS354 and agree that it will provide useful information regarding PAH concentrations east of the former Koppers facility and SS082 where PAH (TEQ) was observed at 37,000 ug/kg. We require that sample SS357 be collected and analyzed during this event.

**Proposed Additional Residential Busy Street Sampling**

1. In the November 11, 2011, e-mail from you to me, Beazer East's preference for avoiding collection of offsite soil samples on NW 6<sup>th</sup> Street was expressed as follows:

*At your suggestion, we also evaluated potential residential busy street background locations along NW 6<sup>th</sup> Street and have identified one portion southwest of the Site that may be suitable for collection of residential busy street background samples. This area is located inside the one-mile radius of the Site but more than half a mile distant from the Site. We have been unable to identify any other areas along NW 6<sup>th</sup> Street that are suitable for the background study. Third-party reviewers of data derived from samples taken within the identified area might incorrectly assert that the area has been subject to a Site influence and is not representative of true background. Accordingly, Beazer would prefer to not collect additional background samples anywhere along NW 6<sup>th</sup> Street, unless EPA is prepared to defend the choice of location by stating that potential Site influence does not extend to this area, and that samples collected at that distance from the Site are representative of true background.*

We continue to have the same concerns related to the lack of representative data collected on NW 6<sup>th</sup> Street as we previously expressed in our July 22, 2011, letter to you, and as has been expressed by Site stakeholders including Alachua County Environmental Protection Department, the City of Gainesville, and the Florida Department of Environmental Protection. As

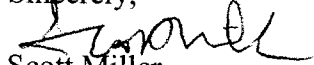
recommended in previous comments, sampling along NW 6th Street in a north and south direction from the Site would provide trend data that is more demonstrative of what concentrations are present as one moves from and beyond the influence of the Site and would support a determination of representative background concentrations. Without such trend data, it would seem difficult to determine whether concentrations above the default soil cleanup target levels (SCTL) are Site-related. Please update the Workplan submittal to include sample points along NW 6<sup>th</sup> street north and south of the Site.

2.EPA concurs with the general approach for identifying possible busy street sampling locations and the identification of an optimal busy street background location included in the Local Intergovernmental Team November 30, 2011, e-mail as included below:

*As another potential location for a residential busy street background sampling area that is similar to the proposed NW 6<sup>th</sup> Street sampling area, we suggest other locations which have similar traffic volumes as defined by average daily trips. For reference the 2011 ADT for NW 6th St between NW 16<sup>th</sup> Ave to NW 23rd Avenues is 12,600 ADT. Alternate 1- NW 16th Ave west of 16th Terrace has a 20,188 ADT. Alternate 2 - NW 8th Ave west of 13th St. has a 14,637 ADT. Alternate 2 is probably the best option for consideration as an alternative sampling location due to its longer record of no construction to disturb the area back of curb.*

We look forward to Workplan implementation in the near future. If we may be of assistance in this matter, please contact me at [miller.scott@epa.gov](mailto:miller.scott@epa.gov) or at (404) 562-9120.

Sincerely,



Scott Miller

Remedial Project Manager  
Superfund Remedial Branch, Section C  
Superfund Division