



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
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ATLANTA, GEORGIA 30303-8960

August 31, 2006

Mr. Michael Slenska, P.E.
Beazer East, Inc.
One Oxford Center, Suite 3000
Pittsburgh, PA 15219-6401

Subject: Supplemental Soil and Sediment Plan - Additional Data for Risk Assessment

Dear Mike,

This letter presents comments from the United States Environmental Protection Agency (EPA) regarding the February 8, 2006, "Supplemental Soil and Sediment Sampling Plan - Additional Data for Risk Assessment", prepared by AMEC Earth & Environmental (AMEC) for the Koppers Superfund Site in Gainesville, Florida. The Florida Department of Environmental Protection (FDEP), Alachua County Environmental Protection Department (ACEPD), and EPA reviewed the work plan and participated in two conference calls (held on August 16, 2006, and August 31, 2006) to discuss the work plan with Beazer and AMEC. Discussion summaries from the two conference calls regarding soil and sediment sampling protocol to be used for evaluating risk are also included in this letter.

EPA agrees with ACEPD that at some of the soil sampling locations specified in Figure 2, an additional soil sample should also be collected at the interval from 0 to 3 inches below ground surface. These samples should be analyzed for metals (including arsenic), dioxins/furans and VOC and SVOC organics. The data will be used to evaluate risk posed by wind-blown soils on offsite residential properties. ACEPD requested the locations for these extra samples to be SS-1 through SS-9. EPA is in agreement with collecting 0-3 inch samples from these locations; however, EPA also requests that four additional 0-3 inch samples be collected as "biased" samples, in non-vegetated areas that are contaminated source areas representing potentially high concentrations, particularly in the four source areas and in SS-90 and SS-91 (the treated pole storage area). The need for off-site surface soil sampling will be evaluated based on the results of these analyses. As discussed during the August 31, 2006, conference call, AMEC and Beazer will consider EPA's request for this additional data and evaluate data needed to assess risk from wind-blown soils.

In our previous conference call on August 16, 2006, EPA asked if the sampling results of the historical soil sample locations shown in Figure 2 are summarized in one table. We understand that these data are presented in several documents prepared years ago. Since these data were used to rationalize where samples will be collected and which contaminants will be

analyzed in the samples for this next sampling event, EPA requests that the historical data be presented in a supplement or an appendix to the sampling plan.

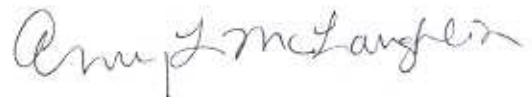
Instead of collecting composite subsurface samples in the interval between 6 inches and 6 feet, EPA requests that during this sampling effort, the subsurface samples be composited from the interval between 6 inches and 2 feet. These data will be used for the evaluation of leaching effects on groundwater. EPA anticipates that during this sampling event, samples will not be collected from below 2 feet. If, however, significant contamination is found in the interval between 6 inches and 2 feet, there may be a need to collect samples below 2 feet at a later date. Beazer stated in the August 16, 2006, conference call that it does not consider leachability standards to apply to unsaturated soils at this site since such high levels of contaminants are present below the unsaturated soils. It is, however, EPA's position that leachability standards apply in the unsaturated soils for the protection of groundwater.

EPA agrees with ACEPD's comment (in the August 21, 2006, letter) on additional sampling locations in the ditch, and FDEP's comments (August 10, 2006) on locations for sediment samples at potential impact areas.

EPA agrees with FDEP and ACEPD regarding the need for background sediment sampling. During the August 16, 2006, conference call, FDEP discussed the need for Beazer to collect additional off-site sediment samples to be used to distinguish between potential contamination from the Koppers site and other possible sources.

Thank you for your time spent on this matter. EPA requests that Beazer modify the work plan to incorporate these comments and proceed with sampling. We look forward to the risk meeting scheduled for October 4, 2006, in Atlanta.

Sincerely,



Amy L. McLaughlin
Remedial Project Manager