Alachua County
Environmental Protection Department

Chris Bird, *Director*

September 30, 2010

Mr. Scott Miller
Remedial Project Manager
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: ACEPD Comments on the Pollution Prevention Plan for Tar Removal Springstead & Hogtown Creeks Gainesville, Florida, submitted by Weston, dated July 2010 for Cabot Corporation

Dear Scott:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the Pollution Prevention for Plan Tar Removal Springstead & Hogtown Creeks Gainesville, Florida, submitted by Weston, dated July 2010. Although the July 2010 plan is more protective of the water resources in the Springstead and Hogtown Creek watersheds, there remain a few items that need clarification.

1. On September 20, 2010 ACEPD staff met Mark Taylor of Weston in the field to further assess several areas in Springstead Creek (S-9 and S-10) and Hogtown Creek (former sump area, H-4, HA and HD near NW 22nd Street). During that site visit one additional area of "tarry material" was located in Hogtown Creek near, but separate from HA. This site was approximately 2 feet in depth, 30-40 feet long and 5-10 feet wide. Weston identified it with the coordinates 29.68022 N 82.34164 W. ACEPD understands that this additional area of tarry material will excavated during the planned tar removal. Additionally, ACEPD showed Mark Taylor of Weston, what we believe to be the former sump area upstream of NW 29th Road and an additional area of contamination downstream of NW 22nd Avenue. It was agreed that Weston would further probe or otherwise evaluate these areas for possible removal activities. The Tar Removal Work Plan and Pollution Prevention Plan should be updated or addenda issued to reflect these changes.

2. **Section 6.0 Turbidity Control & Monitoring**, page 9, paragraph 2 - The use of hay bales and wattles (straw or hay bound with plastic netting) are proposed for use downstream of the work area and installed prior to placement of the water control systems at each location. It is important to note that these sediment trapping devices must be removed as soon as possible after the work is completed or if significant rainfall is expected. The high discharge rates during storm events can carry these materials downstream. Should this happen, removal of these materials from any downstream areas impacted areas will be required. Even though well staked, ACEPD has observed hay bales used for in-stream turbidity controls carried downstream 0.5 miles or more from heavy rainfall events.

3. **Section 6.0 Turbidity Control & Monitoring**, page 10, paragraph 1 – The turbidity measurement section is not adequate and needs additional specifics and updates on monitoring frequency and location. Turbidity measurements must be made both upstream and <u>immediately</u> downstream of the work area(s) and/or the discharge from the pump around prior to beginning work. Turbidity

measurements must be taken again within one hour of beginning work and every two hours thereafter until construction has ceased. Downstream of the work area(s) and/or pump around must be continually monitoring for visual signs of any increase in turbidity. If any increased turbidity is observed downstream of the work area, work must cease (turbidity measurements must be conducted to document turbidity levels in the creek) until the cause of the increased turbidity is determined and a remedy implemented. Turbidity must be measured immediately downstream of the work area at all times measurements are conducted; the proposed location for downstream measurements, 200 feet downstream of the work area, is not acceptable. A daily update on work activities including all turbidity monitoring data, daily logs, and inspection forms must be submitted daily while work is underway to all appropriate local, state and federal agencies.

4. **Section 9.0 Restoration**, page 13, paragraph 2 – The proposed use of matting (e.g., loose weave burlap material) may not be adequate to restore creek access points. The use of Biologs (biodegradable coconut coir pith logs tightly packed in tubular netting) or other similar natural materials may be needed to adequately restore and stabilize these areas.

5. **Section 10.0 Best management Practices & Contingency Planning,** page 14, paragraph 2 ACEPD agrees that the best contingency plan for controlling turbidity during heavy rain events is to cease activities and protect or close the excavation prior to the storm event. This should also include removal of any hay bales or wattles downstream of the work area (discussed above in comment 2.) and anything else that could be transported downstream. Storm event stream discharge in Hogtown Creek has been documented to exceed 100 cubic feet per second (cfs).

6. No mention was made in the plan about a staging area for materials removed. Please provide information about the proposed staging area.

7. The plan should include Best Management Practices for preventing discharges and, if necessary, containment and cleanup of hazardous materials (fuel) associated with the proposed pump and generator system.

ACEPD appreciates the opportunity to provide comments on the pollution prevention plan. We are all interested in making sure this project occurs in a manner which provides appropriate pollution prevention especially with regards to the turbidity concerns. Upon satisfactory response to the above comments, ACEPD is ready to approve the workplan. If you have any questions, please contact me or Robin Hallbourg at 352-264-6800.

Sincerely,

John J. Mousa, Ph.D.
Pollution Prevention Manager

cc: Wayne Reiber, Cabot Corporation
Mark Taylor, Weston
Stewart Pearson, City of Gainesville
Kelsey Helton, FDEP
Robin Hallbourg Gus Olmos