



Alachua County Environmental Protection Department

Chris Bird, Director

August 21, 2006

Ms. Amy McLaughlin
Remedial Project Manager
US EPA Region IV
61 Forsyth Street
Atlanta, GA 30303-3104

RE: ACEPD Comments on the Supplement Soil and Sediment Sampling Plan Additional Data for Risk Assessment, Cabot Carbon/Koppers Superfund Site in Gainesville, Florida

Dear Amy:

ACEPD has the following comments and requested changes in the above referenced plan:

- 1) The borings proposed along the western boundary should include sample collection at a shallower interval, the top three inches (0 to 3 inch composite), in addition to the proposed samples outlined in the plan. The locations for these extra samples are SS-1 through SS-9. These additional shallow samples should be analyzed for metals (including arsenic), dioxins/furans and VOC and SVOC organics. The collection of these additional samples will allow a better estimate of possible offsite impacts.
- 2) Offsite surface soil sampling to the west of the site for potential impacts needs to be done at some point before the feasibility study and final remedies are determined. There needs to be assurance to the residents living next to site that significant offsite impacts do not exist.
- 3) Additional sediment sampling locations in the ditch should be included in the area of the North Lagoon and between SD-01 and SD-02. We concur with FDEP's comments of August 1, 2006 on locations for these sample sites. We also request that deeper samples be taken in one boring at each of the seven sites. These deeper samples should be obtained from depths of 0.5 to 2 feet below land surface (bls) and 2 to 4 feet bls at each of the seven sample locations (four originally proposed and three sites added).
- 4) We concur with FDEP about the need for background monitoring to establish impacts from other potential sources.

Please do not hesitate to contact me if you have any questions.

Sincerely,

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

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