



Alachua County Environmental Protection Department

Chris Bird, Director

June 3, 2009

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

Re: ACEPD and City of Gainesville Comments on the May 29, 2009 AMEC Memorandum:
Additional Offsite Soil Sampling Cabot Carbon-Koppers Superfund Site

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) has the following comments regarding the AMEC Plan for Additional Offsite Soil Sampling for the Cabot Carbon/Koppers Superfund Site, dated May 29, 2009. These comments were developed with input from ACEPD and the City of Gainesville.

- 1) ACEPD disagrees with the assumptions made in the AMEC plan regarding the adequacy of the current data to delineate the extent of contamination exceeding FDEP SCTLs. Additional sampling locations and adjustments in the analytical parameters tested are required to adequately delineate the extent of contamination due to the sampling and analytical variability associated with testing at these low levels for arsenic, BAPTE and TCDD TEQ. ACEPD requests the following additions to the sampling plan:
 - a. For sample locations SS54, SS55, SS56 and SS57 taken on NW 28th Ave, Polynuclear Aromatic Hydrocarbons (PAHs) should be included in the analyte list to determine the BAPTE. (It is understood that SS55 is only proposed for initial analysis).
 - b. Given potential sample variability, ACEPD does not agree with the use of adjacent locations to define delineation in the vicinity of sample locations, SS15AA, SS07AA and SS06AA and SS09AA. ACEPD believes that additional confirmation along the road rights of way are needed to assure adequate delineation. ACEPD requests that one additional sample should be taken and analyzed at each of the following locations to supplement the existing data set:
 - One additional sample on NW 26th Ave. West of SS15AA, to be analyzed for TCDD-TEQ and arsenic.
 - One additional sample West of SS07AA/SS06AA along NW 32nd Ave, to be analyzed for TCDD-TEQ and PAHs.
 - One additional sample to the West of SS09AA along NW 31st Ave should be analyzed for TCDD-TEQ and arsenic.

- 2) As previously requested by ACEPD and by both the City of Gainesville and Alachua County Commissions, soil samples should be taken from the top 3 inches in addition to the planned top six inches of soil for the some or all of the additional offsite sampling locations. Since it is likely that the offsite contamination is a result of windblown dust from the Koppers site, ACEPD and local community are concerned that the top 3 inches of soil may contain a higher level of contamination than that which is measured in the top 6 inches of soil and thereby pose a higher degree of health risk. ACEPD requests that sample locations SS51, SS55 and SS47 be considered as potential locations for taking samples from the 0-3 inch depth. While ACEPD understands that FDEP regulatory requirements support utilizing data from the 0 to 6 inch depth for delineation purposes, nevertheless, ACEPD believes it is very important that 0 to 3 inch sample depths be investigated similar to the on-site sampling in order to determine the full magnitude of any contamination offsite and provide better information about potential risks from airborne contamination.
- 3) In addition to the planned offsite sampling to the west of the Koppers site, additional delineation of the offsite contamination to the south and east of the Koppers site needs to be completed. There remain samples on the Site at the southern and eastern perimeter with elevated concentrations that still do not meet the criteria for delineation.
- 4) The ultimate goal for the offsite sampling in this area is to support risk management decisions for individual residential properties. The AMEC plan with the requested changes above appears to meet the objective for delineation. However, clear objectives for the use of these data need to be developed to determine potential remedial actions at individual properties. This may require additional sampling on specific residential properties.

We appreciate the opportunity to comment on these work plans. If you have any questions about our comments please contact me at 352-264-6805.

Sincerely,



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

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