

January 8, 2009

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

Re: Proposed Changes to Background Sampling Locations, Issues of Agreement and Remaining Issues for Discussion – Cabot-Koppers Superfund Site Offsite Sampling Plan

Dear Mr. Miller:

In a December 23, 2008 letter, the AMEC October 2, 2008 “Off-Site Sampling Plan for Cabot Carbon/Koppers Superfund Site, Gainesville, Florida” was conditionally approved by USEPA. One of the USEPA conditions requires that Beazer East (Beazer) work with the City of Gainesville (City) and Alachua County Environmental Protection Department (ACEPD) representatives to choose at least one additional neighborhood from which to obtain background soil samples so that concerns related to statistical validity of background samples may be addressed. This letter contains recommendations from ACEPD and the City on changes in the proposed background sampling locations including the additional neighborhoods.

ACEPD and the City had previously submitted detailed comments to USEPA on the AMEC plan on November 6, 2008. Based on a December 18, 2008 telephone conference call with USEPA and representatives of Beazer and AMEC and the conditions of the USEPA approval letter, ACEPD and the City understand the following issues to have been agreed to in order to move forward with the sampling plan:

- The AMEC sampling plan is part of phased approach, recognizing that determination of extent of contamination (delineation) remains a regulatory requirement.
- ACEPD and the City will propose and negotiate with AMEC changes to the background locations (as included with this letter).
- Two additional sampling locations from west of the Koppers site on NE 4th Terrace and south of the site will be included in this sampling event.
- ACEPD and the City acknowledge that FDEP and EPA support sampling the soil interval from 0-6 inches. However, it remains the opinion of the City and ACEPD based on guidance from the Florida Department of Health that the most appropriate and conservative sampling interval is 0-3 inches. We believe that this best represents current exposures, and the more likely interval to be impacted by chemicals of concern from deposition or runoff from the site.
- AMEC will finalize specific coordinates/locations collaboratively with ACEPD and City.
- Following an initial data review, AMEC will discuss the background data set and statistical approach with the City and ACEPD prior to completing the background comparison.

One ACEPD and City recommendation that was not resolved was the recommendation for additional characterization of the background and offsite soils (organic carbon content, grain size analysis, soil pH and photo documentation). We believe that this information is important to be able to compare the

analytical data with soil types and request further consideration of this recommendation by USEPA and Beazer/AMEC as the background locations are being finalized.

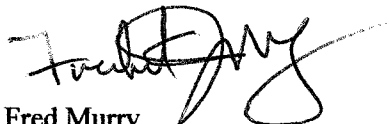
ACEPD staff (Dr. John Mousa and Robin Hallbourg, P.G.) and Dr. Pat Cline, technical consultant to the City, have developed proposed changes to the AMEC background sampling locations. The proposed changes, with general locations as shown on the attached Figure 1, increase the number of samples to twenty (20). The additional proposed background areas include two residential neighborhoods with similar soil types and are consistent in age with the neighborhood adjacent to the Koppers Site. Two samples are also proposed in Northwood Park. This has similar soil types, is accessible and near commercial activities (near 34th Street and 441).

With the addition of samples in these areas, the numbers of samples in the two areas previously identified by AMEC were reduced. There is a concern that these initially proposed areas are not as representative or comparable to the neighborhood to the west of the Site, and there may be point source impacts at one or more of these locations that do not reflect background. Fifteen samples are needed to complete the statistical analysis. Increasing the total number of samples to 20 provides the opportunity to eliminate selected data points from these areas if, following critical data review, they are not consistent with background data sets considered more comparable to the Site (e.g. show impacts from point sources or historical activities dissimilar to the Site area).

ACEPD and Dr. Cline would be happy to discuss these proposed changes to the background soil sample locations and any remaining unresolved issues further with USEPA, Beazer and AMEC as needed.

If you have any questions, please contact me at 352-393-8674.

Sincerely,



Fred Murry
Assistant City Manager

Attachment: Figure 1. Proposed Changes to AMEC Off-Site Sampling Plan for Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

CC:

Honorable Mayor and City Commissioners
Joseph Robb, P.G., AMEC
Greg Council, GeoTrans
Chris Bird, Director, ACEPD
Stu Pearson, City of Gainesville
Dr. Pat Cline
Kelsey Helton, FDEP

Russ Blackburn, City Manager
Mitch Brouman, Beazer East
John Mousa, Ph.D., Pollution Prevention Manager
Rick Hutton, GRU
Anthony Dennis, Alachua County Health Dept
Randy Merchant, Florida Department of Health
Robin Hallbourg, ACEPD

Figure 1: Proposed Changes to Background Sampling Locations

