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Subject: ACEPD Recommended Changes in Next Round of Offsite Soil Sampling in Rights of Way in Neighborhood West of Koppers
Date: Friday, December 04, 2009 8:52:00 AM

Scott,

ACEPD understands that AMEC plans to begin an additional round of sample site selection and soil sampling on December 17 and 18 for an additional 12 sampling locations along rights of way in the neighborhood west of the Koppers site. These sample locations represent samples to be taken approximately 350ft, 400ft, 450 ft and 500ft from the Koppers boundary along NW 29th Ave, NW 28th Ave, and NW 26th Ave. According to the AMEC workplan dated September 29, 2009, it appears that only one sample from each of the three streets will be analyzed first and based on the results then a sample further west may be analyzed to be able to show the meeting of the 7ppt TCDD FDEP SCTL. This approach is a continuation of the sequential approach performed in the previous sampling.

ACEPD would like to request that in order to expedite the completion of the delineation of the contamination in this neighborhood along these right of ways, that all the collected samples be sent to the laboratory and analyzed for TCDD at the same time rather than taking a sequential approach. While there will be additional analytical testing costs incurred in this approach, ACEPD believes that this approach is urgently needed at this time to speed up the offsite sampling effort and provide data to allow the next phase of the offsite assessment and remediation to proceed expeditiously. This is especially important in light of the increased anxiety and concern from offsite residents about the offsite sampling schedule and results. The sequential process is just taking too long to do. ACEPD and the City of Gainesville have previously expressed to you and FDEP our interest in expediting the sampling and testing schedule. Another benefit in addition to expediting the receipt of data and the delineation is that analyzing all of these samples may also provide additional data beyond the line where the 7ppt level is reached to verify that in fact the furthest extent of contamination above SCTLs has been determined.

In a related issue, the latest soil sampling data previous collected and reported by AMEC in the September 29, 2009 letter report on samples from NW 31st St and NW 30th Ave has indicated that TCDD levels of 6.9 ppt and 7.3 ppt have been measured, respectively. AMEC has stated that these concentrations are very close to the FDEP SCTL and therefore no additional samples further west need to be taken. ACEPD believes that because of the analytical imprecision and sampling variability involved with TCDD testing, one cannot determine with certainty that these levels are confidently below the SCTL. If these samples are to be used to mark off the boundary of the potentially impacted areas, ACEPD is concerned that Beazer and EPA we may not have accurately delineated the area beyond which the concentrations are below the SCTLs. ACEPD believes that there needs to be some consideration given as to how these concentrations close to the SCTL are to be interpreted and used to demark the contaminated area. ACEPD would like to recommend that an additional 2 samples could be taken and analyzed that are beyond the latest NW 31st and

NW 30th Ave samples to confirm that TCDD concentrations are in fact below the 7 ppt level. These sampling points can be determined and samples taken during the Dec 17 and 18 event.

If you have questions about these comments please contact me. I will be in the office on Mon and Tuesday of next week but will be out on Wed , Thur and Friday.

Thank you for your continued effort on developing a effective remedy for the contamination at this site.

John Mousa