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Subject: Koppers- October 16, 2007 Revised Data Summary Report - Supplemental Soil Sampling Results
Date: Friday, October 26, 2007 3:38:09 PM

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DEP has performed a preliminary review of the updated results of the onsite soil and sediment sampling conducted at the Koppers site. More extensive review comments to the October 2007 Revised Data Summary report will be provided to EPA in the near future.

The purpose of the supplemental sampling was to support an updated risk assessment which would include identification of all potential routes of exposure, and to support re-evaluation and selection of an amended Superfund remedy. The previous March 2007 data summary report was qualified due to QA issues that were to be addressed by sample cleanup and re-analysis, in particular for dioxin. The October 2007 report presents those results and confirms concerns previously expressed by DEP that the off site presence and extent of soil and sediment contamination has not been adequately assessed.

The October 2007 revised report confirms that onsite soils contain concentrations of arsenic, dioxin, pentachlorophenol and benzo-a pyrene exceeding the EPA screening quality guidelines along with the DEP Chapter 62-780, FAC soil cleanup target levels (SCTLs) based on a 10^{-6} risk management level for both residential (unrestricted) and commercial/industrial use, including samples obtained along the Koppers site property boundaries. Concentrations for "total PAHs" are also provided on a site map, but without a breakdown of individual PAH contaminant concentrations. There is no risk-based criterion for "total PAHs"; however, based on historical site data and contaminants of concern identified in the prior risk assessment and Record of Decision, we anticipate that individual non-carcinogenic PAHs still exceed acceptable risk management levels (10^{-6} or Hazard index > 1) at the site.

DEP is particularly concerned with soil contaminant levels along the site property boundaries where elevated concentrations suggest possible off site migration of contaminants. In addition, elevated contaminant levels were also confirmed in sediments in the onsite drainage ditch traversing the site. As discussed previously and based on the current data, off site soil and sediment sampling and delineation of site related contaminants must be conducted to determine if an off site risk of exposure exists and to determine the necessary remedial action to address that risk. Off site soil and sediment contaminant delineation should be based on unrestricted use criteria and sediment quality guidelines (SQGs), respectively. As noted in DEP's February 06, 2007 email communication to EPA, leachability must also be considered. And site-specific background concentrations may also be considered.

We request that Koppers submit an offsite soil and sediment sampling scope of work as soon as possible. Offsite soils and/or sediments with site related contaminants exceeding 10^{-6} or HI of 1 for the respective land use and leachability criteria must be addressed in the amended Superfund site remedy. The corresponding numerical SCTLs based on unrestricted use and leachability (see Chapter 62-777, FAC.) and Sediment Quality Guidelines (SQGs) for freshwater environments should be used to develop the off site sampling scope.

Please call me if you have any questions or would like to discuss further.

Thank you.

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