

From: [Helton, Kelsey](#)
To: [John Mousa](#)
Cc: [Helton, Kelsey](#); [Murchison, Nancy](#)
Subject: FW: Koppers- Interim Stormwater proposal
Date: Monday, August 09, 2010 2:22:29 PM
Importance: High

John- As promised, please see DEP-Tallahassee review comments below regarding proposed interim stormwater control measures at Koppers. You were cc'd by Beazer/Geotrans on their responses to comments previously. I am available to discuss if you have any questions. Thanks- Kelsey

From: Helton, Kelsey
Sent: Wednesday, June 30, 2010 2:40 PM
To: Miller.Scott@epamail.epa.gov
Cc: 'Brouman, Mitch (Pittsburgh) NA'; Council, Greg; Helton, Kelsey; Martin, Jeff
Subject: FW: Koppers- Interim Stormwater proposal

Scott- Please consider DEP- Bureau of Waste Cleanup comments below regarding proposed interim storm water control measures. Thank you- Kelsey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Kulakowski, Zoe
Sent: Thursday, June 17, 2010 5:00 PM
To: Martin, Jeff; Rachal, Richard; Patel, Ashwin
Cc: Helton, Kelsey; Fitzsimmons, Michael; Dougherty, Brian
Subject: RE: Koppers, Gainesville CERCLA site

Jeff and Kelsey, I quickly looked over the Interim Stormwater proposal and the figures and I have concerns.

- (1) The plan proposes to remove impervious and compacted surfaces that presently minimize the amount of percolation that occurs through the contaminated soils and subsurface. What specific impervious/compacted surfaces are proposed to be removed should be depicted on a figure relative to the known source areas. The current limitation on percolation minimizes horizontal and vertical contaminant migration and thus is more desirable to our program than getting the area grassed. If grass is critical, we'd prefer that backfill be installed over the current surfaces and be utilized for the growing medium.
- (2) The contaminants of concern include more than CCA constituents. Historical wood treatment included pentachlorophenol and creosote, so there are also PAHs, PCP, and dioxin in the runoff. The predesign concentrations of arsenic (average 228 mg/l) and chromium (average 272 mg/l) can potentially fail TCLP and may result in the accumulation of TCLP sediments in the impoundments. TCLP testing should be included as well as testing for all of the constituents. Of course it is better to capture this runoff onsite for final remediation with the rest of the highly contaminated soils. Final testing of pond sediments for maintenance activities should include SPLP to determine the potential leachability for disposal.
- (3) I'm sure that a water truck requirement is standard to prevent the generation of any dust.

- (4) The proposed impoundment locations are in areas where the soil is contaminated although the data availability is more sparse than the rest of the site: Known surface soil concentrations on the north side of the existing ditch where the north berm is proposed:
 - (a) for four samples: arsenic 40-200 mg/kg, PCP 150-1300 ug/kg, total PAHs 6760-46,045 ug/kg, no dioxin data
 - (b) No data is available for the south side of the existing ditch for any analyte
 - (c) For the South Impoundment – three samples: arsenic 57-170 mg/kg, PCP 830-8600 ug/kg, total PAHs 26,734-155,600 ug/kg, one dioxin sample: 837 ng/kg
 - (d) For the North Impoundment – one sample: arsenic 26 mg/kg, PCP 57 ug/kg, total PAHs 15,138 ug/kg, no dioxin samples; but the two closest detected 365 and 2611 ng/kg
- (5) The proposed locations of the impoundments are above highly contaminated groundwater and the north impoundment is potentially over newly revealed creosote trenches/source material. In consideration of the interim proposal and the presence of contaminated materials, would it be possible to have both impoundments lined to prevent impoundment recharge to groundwater? As another alternative, the existing surficial extraction system pumping rate could be increased to capture any additional recharge and contaminants . This would minimize the adverse potential for increased plume recharge and migration.
- (6) The nature of the berm material was not identified; leachable soils should not be used to construct the berm unless covered by a 40-60 mil liner. Otherwise, clean soils are preferred.

From: Martin, Jeff
Sent: Thursday, June 17, 2010 11:33 AM
To: Rachal, Richard; Patel, Ashwin
Cc: Kulakowski, Zoe; Helton, Kelsey; Fitzsimmons, Michael
Subject: RE: Koppers, Gainesville CERCLA site

Rick and Zoe,

Here is the individual stormwater application submitted by the consultant for Beazer's that is under review at this time. I have a number of questions so far, and I would appreciate receiving any comments /questions. Thank you,
Jeff

From: Rachal, Richard
Sent: Thursday, June 17, 2010 11:23 AM
To: Martin, Jeff; Patel, Ashwin
Cc: Kulakowski, Zoe; Helton, Kelsey; Fitzsimmons, Michael
Subject: FW: Koppers, Gainesville CERCLA site

Jeff,

Can you answer Zoe's questions??

Thanks,

RICK

From: Kulakowski, Zoe
Sent: Thursday, June 17, 2010 11:16 AM
To: Rachal, Richard
Cc: Helton, Kelsey
Subject: Koppers, Gainesville CERCLA site

Rick, I have heard through the grapevine that Koppers has submitted an IRM stormwater permit. I understand that the proposed location is on the north end of the site where surface soils are contaminated. There are also high groundwater concentrations indicative of potential DNAPL and saturated source material across most of the north area. Has the District received such a document and how is a stormwater proposal in a contaminated location handled/coordinated?

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