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Subject: Koppers site- Offsite Soil Sampling- Followup to 12/18/08 conference call
Date: Monday, December 22, 2008 4:22:43 PM

Scott-

This is a follow up to the 12/18/08 conference call in which we discussed the proposed offsite soil sampling scope of work, and in particular background sample locations. During that conference call, DEP expressed concern that the approach was not consistent with DEP guidance and the focus would not meet the intent of the guidance which is to determine concentrations of contaminants in soil not affected by the site and to distinguish between off property site-related contamination and other off property sources near the site.

I have further discussed internally AMEC's proposed approach of focusing background sampling in 2 offsite areas with likely historical industrial activity with the goal of comparing contaminant concentrations in those 2 "background" neighborhoods to similar contaminants in the neighborhoods adjacent to Koppers. This approach erroneously presumes that if elevated levels are observed in these 2 remote background neighborhoods, it can be concluded that these represent applicable background concentrations at Koppers. Rather, the data will only demonstrate the concentrations in those specific neighborhoods.

DEP supports incorporation of a 3rd area of sampling to obtain a broader - and hopefully less biased - set of background data that is: 1) closer geographically to the Koppers site such that representative background can be compared to Koppers and supports off property delineation, if necessary; and 2) located in areas not purposely selected based on likely past or current industrial activities. We recommend that the additional sampling consist of 15 sample locations.

We look forward to inspection and selection of the offsite sampling locations, and review of the resulting data. We understand that the offsite soil sampling effort is a phased approach and that additional offsite data may be obtained as necessary.

Thank you for the opportunity to participate in the review of the work plan.

Kelsey Helton, DEP- Bureau of Waste Cleanup

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