

From: [Helton, Kelsey](mailto:Helton_Kelsey)
To: Miller.Scott@epamail.epa.gov
Cc: Mitch.Brouman@hanson.biz; paul.anderson@amec.com; [John Mousa](#); [Hutton, Richard H](#); Randy_Merchant@epamail.epa.gov; [Helton, Kelsey](#); [Mora-Applegate, Ligia](#)
Subject: RE: Proposed additional off-Site soil sampling at the Cabot Carbon/Koppers Superfund Site
Date: Friday, June 05, 2009 12:07:42 PM

Scott-

DEP has reviewed the referenced work plan for additional soil sampling west of Koppers to delineate extent of contamination above State Soil Cleanup Target Levels (SCTLs) for unrestricted use. We have also reviewed the comments provided by John Mousa of the Alachua County Environmental Protection Department (ACEPD).

We agree with the ACEPD recommendations for additional sample locations to delineate the extent of soil contamination in the vicinity of SS15AA, SS07AA and SS06AA. We also agree that it would be prudent to include PAHs in the proposed locations along NW28th Ave. Please note that if there are soil concentrations detected above their respective SCTL in the 0-6" bls sample interval, confirmation is necessary at the 6"-2' sample interval for those locations.

Similarly to previous offsite samples, the proposed locations are on ROWs west of Koppers. We understand that this is part of a phased approach to determine the extent and magnitude of offsite contamination. We anticipate that additional sampling will be necessary to determine more specifically the distribution of contamination above State SCTLs on residential properties. And to support decisions related to offsite cleanup actions.

In addition, as previously discussed, we also recommend that offsite soil sampling include locations south and east of the Koppers facility property.

Finally, to clarify the issue of the sampling intervals. Chapter 62-780 requires that vertical sampling intervals across the top 2 feet of soil not exceed vertical intervals of 0 - 6" bls and 6" - 2' bls. Results from these intervals are used not only in assessment to delineate the extent of contamination above SCTLs but also to assess the risk posed by those contaminant levels and to determine the need for remedial action of those "surface soils" at hazardous waste sites in Florida. The adequacy and protectiveness of these prescribed sample intervals was vetted during DEP rule making which included a "soil forum" during development of Chapter 62-780, "Contaminated site cleanup criteria" rule.

Sampling from 0-3" bls is not required by Department rules. However, responsible parties may elect to use this sample interval. If the 0-3" interval is to be applied, then samples would also need to be collected from the 3-6" interval for a complete representation of that 0-6" depth interval.

The concern here with the introduction of a 0-3" sample interval is the issue of consistency of sampling intervals with other site data to allow representative and comparable samples to be evaluated as part of the risk assessment. Data currently being used in the onsite risk assessment is based on a 0-6" interval. If 0-3" sampling is to be considered, it should be clear how that additional data will be incorporated into delineation, risk and remedial action decisions and how it will be weighted relative to the co-located 0-6" results.

Based on previous discussions with both EPA and Beazer, it is DEP's understanding that the offsite soil sampling results will be compared directly to the State SCTLs for unrestricted use such that a risk assessment is not necessary to support offsite remedy decisions. If a risk assessment is proposed for the offsite soils, pursuant to Chapter 62-780, each individual residential property would represent an exposure unit (EU, 1/4 acre or less) with a minimum of 10 samples per EU per sample horizon required to evaluate the potential risk for each EU.

Thank you for consideration of the above comments. DEP looks forward to delineation of the offsite soil contamination and determination of appropriate Superfund actions to address that contamination.

Kelsey Helton
DEP- Bureau of Waste Cleanup
Hazardous Waste Cleanup Section
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The Department of Environmental

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survey: <http://survey.dep.state.fl.us/?refemail=Kelsey.Helton@dep.state.fl.us> Thank you in advance for completing the survey.

From: Miller.Scott@epamail.epa.gov [<mailto:Miller.Scott@epamail.epa.gov>]
Sent: Wednesday, June 03, 2009 7:32 AM
To: John Mousa; Helton, Kelsey; Pat Cline; Hutton, Richard H;
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Cc: Mitch.Brourman@hanson.biz; paul.anderson@amec.com;
Koporec.Kevin@epamail.epa.gov
Subject: Fw: Proposed additional off-Site soil sampling at the Cabot Carbon/Koppers Superfund Site

Good morning, All,
AMEC on behalf of Beazer East is in a position to get out in the field early next week and take soil samples per the proposed attached plan. We believe that it's a good thing to move forward with additional samples to further characterize Site effects in the Stephen Foster neighborhood in an expedited fashion.

It was our sense from the May 19 conference call that there was general agreement on these locations. However, it's possible to add a few sample

locations into this round of sampling in addition to those proposed. Please express your views on this approach and indicate if you would favor beginning this sampling round early next week. I will be out of the office today so please communicate directly via e-mail and/or to Paul Anderson with additional items/concerns on sample locations. You may reach him via e-mail or phone at 978-692-9090.

Thank you,
Scott Miller
Remedial Project Manager
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----- Forwarded by Scott Miller/R4/USEPA/US on 06/03/2009 07:15 AM -----

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Subject
Proposed additional off-Site soil
sampling at the Cabot
Carbon/Koppers Superfund Site

Dear Mr. Miller:

On behalf of Beazer East, Inc., attached please find a letter describing proposed additional off-Site soil sampling at the Cabot Carbon/Koppers Superfund Site.

Best Regards,

Paul Anderson

Paul D. Anderson, Ph.D.
Vice President,
Technical Director, Risk Assessment
AMEC

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(See attached file: Gainesville Letter to EPA Additional Sampling 052909.pdf)