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Subject: Review of ""Field Investigation of Historical Linear Features Identified from Aerial Photographs and Potential Drum-Disposal Areas, Koppers Inc. Site, Gainesville, Florida".
Date: Wednesday, December 08, 2010 3:49:14 PM

Scott-

DEP has completed review of the proposed "" *Field Investigation of Historical Linear Features Identified from Aerial Photographs and Potential Drum-Disposal Areas, Koppers Inc. Site, Gainesville, Florida*". Our comments are as follows:

- Recommend flexibility on # of trenches, to be based on EM/GPR findings. We would prefer to see EM/GPR results and recommended trench locations prior to trenching.
- Length of trenches are unclear. 1 foot wide may be too limiting in terms of visibility and confirmation of presence of drums, staining etc. Depth of trench should be 8 feet or to water table, whichever is deeper.
- Recommend trench sampling to characterize soils associated with aerial photo anomaly, whether or not drums are encountered, based on most staining or other evidence of potential contamination. Please clarify if sample is composite or grab from more highly effected area. We recommend that grab sampling be conducted at multiple depths with vertical sampling depth interval not to exceed 2'.
- Recommend that drums be segregated for disposal rather than returned to excavated area, particularly if there is evidence of waste product in the drums.
- Excavation/trenching should be accompanied by dust control measures. Dust monitoring may be warranted to evaluate controls and document no offsite migration of dust. Please clarify how this will be addressed.
- SW area- Results of EM/GPR/trench sampling should be compared with historic aerial photos and existing soil sample locations to determine where additional soil samples are necessary to characterize and delineate potential source areas during remedial design. Supplemental soil sample locations will be needed to characterize the historic pond and other anomalous areas shown in older aerial photos, located west and north of the currently identified South Lagoon area. Recommend trenching and additional soil borings in those areas. Existing soil samples in top 2' are not adequate to characterize deeper source areas.
- North Central Area (linear features)- 1 trench may miss potential disposal areas associated with linear features. Recommend 2 trenches that transect those features.
- WP proposes analysis for semi-volatiles and VOAs. Sampling and analysis should include dioxin/ furan and CCA. We assume that the semi-VOA analysis captures all PAHs and phenolic compounds including PCP.
- Recommend use of EM/GPR that captures non-ferrous as well as ferrous features, as some drums may be PVC or plastic.
- Finally, it would be useful for Beazer to review older aerial photos and put together an updated site map that identifies these anomalies (along with previous 4 source areas) and provide recommendations regarding future source/soil sampling during design.

Please let me know if you have any questions. DEP is available to discuss these comments at your convenience.

Kelsey

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