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Subject: DEP review of the Cabt Sediment Removal work plan and Pollution Prevention Plan
Date: Monday, October 11, 2010 6:44:52 PM

Scott- DEP has completed review of the revised July 2010 Pollution Prevention Plan as well as the recent September 30, 2010 ACEPD review comments of same. Details of the proposed removal action to address the more contaminated tarry substances in offsite sediments is much improved by the revised pollution prevention plan. Previous concerns and comments provided by DEP have been addressed. DEP supports the review comments provided by ACEPD. We also offer the following comments and recommendations and anticipate that with incorporation of those details into the final plan, the proposal will be acceptable to the State.

- 1) We recommend that the limits of removal in each location be surveyed and depths of excavation/observations be documented in an interim removal action report.
- 2) We recommend that a 40 ml liner be used in the staging area to contain (underlie) the stockpiled soils and ensure effective containment of water generated during dewatering.
- 3) Where upland areas are cleared for access, please note that re-vegetation or cover, including gravel, must effectively prevent erosion and transport of exposed upland soils by storm water in accordance with DEP storm water regulations.
- 4) The pollution prevention plan makes reference to possible grading of the banks for access. Such grading should be avoided where possible. The exemption from a DEP submerged lands permit is predicated on minimal invasive actions within wetlands of the creek, other than the obvious benefit of the contaminated sediment removal. Access using heavy equipment should be from uplands rather than wetland areas along the banks.
- 5) We understand that there will be some backfilling using existing creek sediments from less contaminated areas (not designated for excavation based on the absence of visible tarry materials). While not apparent based on visual inspection, backfilled sediments may contain site related contaminants at concentrations above Superfund long term cleanup goals, including SCTLs and State sediment quality guidelines. DEP acknowledges that this is an interim removal action and understands the backfill rationale and that confirmatory sampling is not planned as part of this action. We agree that the interim action will likely remove a substantial part of the contaminant mass. Note, however, that confirmatory sampling will be necessary in the future to ensure that appropriate long term cleanup goals are met by the Superfund remedy and to determine if additional action is necessary to meet those criteria.
- 6) We recommend that the perforated 55-gallon drum that Weston has proposed to use to limit sediment fouling of the upstream side transfer pump be wrapped with a geotextile with a pore size that is small enough to protect the pump from fouling, but large enough that the geotextile does not become plugged with trapped sediment.
- 7) We recommend that Weston consider keeping a supply of material on hand to stabilize the remaining water in the dewatered sediment so that the sediment does not release water as it is being loaded and transported off-site. Gravity dewatering will only remove water in excess of the saturated soil moisture-holding capacity of the soil. If the dewatered soil is subsequently disturbed, water is likely to be released as the sediment particles realign into closer packing under the influence of gravity. Products such as polyacrylamide gel, fly ash and Portland cement can be used to absorb and/or stabilize water that remains in the dewatered sediment
- 8) Locations S-9 and S-10 are currently excluded from excavation in the sediment removal plan due to access and removal implementation issues. If subsequent reconnaissance efforts resolve these issues, an addendum to the plan should be provided detailing how these areas will be accessed and sediment removal accomplished, prior to implementation.

Please let me know if you have any questions. DEP looks forward to receipt of a finalized plan and implementation of the interim action sediment removal.

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