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**Subject:** Koppers- Offsite soils  
**Date:** Thursday, October 29, 2009 11:34:14 AM  
**Importance:** High

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John- Per your request, to follow up on our conference call Wednesday regarding expediting an offsite soil removal at the Koppers site:

- EPA, DEP, the City/ACEPD and DOH (“the agencies”) all agree that excavation and removal of contaminated soils exceeding DEP’s 10-6 SCTLs is the preferred remedy to expeditiously address soil contamination on offsite residential properties. Removal would include excavation of contaminated soils and backfill with clean fill and restoration of landscape including seeding/sodding.
- Lateral and vertical extent of the soil removal will depend on the results of additional soil sampling.
- Offsite soil sampling is necessary to delineate those soils requiring removal, including sampling of residential properties. A sampling plan based on a grid system will be developed. A grid sampling system based on 100’ X 100’ spacing with soil samples collected at the 0-6” and 6”-24” vertical intervals is proposed. Sampling results are not intended to be used to conclude an individual property does not require removal, but rather to support the design of an excavation plan (including cut lines) which assumes that all properties located in the footprint between the offsite limits of soil contamination west of Koppers and the west Koppers property boundary are contaminated (based on ROW 0-6” sampling results to date).
- Written permission from offsite property owners allowing access to conduct sampling is required prior to sampling of their properties. Written permission allowing access to conduct the soil removal must also be obtained from offsite property owners prior to the soil removal action. Timely signed site access agreements from the property owners is critical for the soil sampling and soil removal activities to occur as proposed.
- The projected schedule to complete the offsite soil removal is approximately 1 year as follows: Assuming timely permission is obtained from property owners, sampling and analysis can be completed in about 3 months with a removal plan approved within the next 3 month (6 months total). The removal action would then be initiated. Completion of the off site removal action including restoration of excavated properties is projected to take about another 6 months.

In addition to the above sampling and removal action, it was also reiterated that offsite sampling to the north/northeast, south, and east of the Koppers facility is also necessary to identify any soils with site related contaminants at concentrations above SCTLs for industrial or residential use so that appropriate actions- including removal or possible institutional controls on existing commercial properties- can be identified and implemented. In particular, sampling would include the day care center property south of the site.

Please forward to other parties that participated in the conference call. Let me know if I missed anything.

Thank you- Kelsey

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