

From: [Helton, Kelsey](#)
To: ["Taylor, Mark"](#)
Cc: [Wayne Reiber](#); [John Mousa](#); ["miller.scott"](#); [Helton, Kelsey](#); [Kleinfelter, Jessica](#)
Subject: RE: Cabot site, Gainesville - Sediment/Tar Removal Project 1 Last Check on Permits
Date: Wednesday, January 26, 2011 3:07:22 PM
Importance: High

Mark-

I checked on one more area where permits are often required at removal projects. That is the NPDES Stormwater Pollution Prevention permit (Chapter 62-621.300(4)(a)) associated with small and large construction projects. You are probably familiar with it from other projects. I spoke with Jessica Kleinfelter at DEP who indicated that if the *combined* several creek access areas, equipment storage area and soil stockpiling area(s) exceed 1 acre, then the NPDES permit is triggered. Note that while the *administrative* requirements of procuring a permit are *exempt* under Superfund (where work is being conducted "onsite", defined as the extent of contamination), the substantive technical requirements of complying with a Stormwater Prevent Pollution Prevention Plan (SWPPP) would apply.

It appears that the combined areas will likely exceed the 1 acre trigger. If so, we recommend that you go ahead and apply for the permit/ submit the SWPPP on line through the DEP- NPDES Program web site (INOI). The permit is essentially self-implementing. If you pay the fee on-line with a credit card, the DEP acknowledgement email will be issued and permit coverage is automatically effective in 48 hours. The Removal Work Plan and addendum 1 (Pollution Prevention Plan) may be included to support the SWPPP. This approach should expedite DEP approval and ensure that all stormwater pollution prevention requirements are met.

Please let me know if you have any questions.

Kelsey

Kelsey Helton
DEP- Bureau of Waste Cleanup
Hazardous Waste Cleanup Section
Tallahassee, FL
850-245-8969

From: Webel, Connie
Sent: Wednesday, January 26, 2011 11:14 AM
To: Helton, Kelsey; 'Taylor, Mark'
Cc: Wayne Reiber; John Mousa; 'miller.scott'
Subject: RE: Cabot site, Gainesville - Sediment/Tar Removal Project 1 Last Check on Permits

I have reviewed the scope of work included in the work plan for the sediment removal project and have provided comment that the project as currently designed, together with BMP's, meets the substantive technical requirements of the ERP program and that no further DEP ERP permits are required.

If I can clarify further, please do not hesitate to call.

Connie Webel
Environmental Manager
904-256-1652

From: Helton, Kelsey
Sent: Tuesday, January 25, 2011 6:18 PM
To: 'Taylor, Mark'
Cc: Wayne Reiber; Helton, Kelsey; Webel, Connie; John Mousa; 'miller.scott'
Subject: RE: Cabot site, Gainesville - Sediment/Tar Removal Project 1 Last Check on Permits
Importance: High

Hi, Mark-

I am following up on your request for confirmation that a DEP permit is still not required for the Hogtown/Springstead creek sediment removal project to be conducted by Cabot and Weston shortly.

Connie Webel at the DEP NE District previously indicated that no DEP permits are necessary for the sediment removal project, as communicated in DEP Work Plan review comments dated October 11, 2010. The draft Final Dec 3, 2010 Removal Work Plan was forwarded to Connie who said the Work Plan looked fine. DEP- Tallahassee review comments were subsequently forwarded to you on Dec 8, 2010 and the District was cc'd on those comments. A revised Removal Work Plan has not been provided to DEP in response to the December 8th comments but the review comments would not have substantively changed the scope of work or approach regarding sediment excavation contained in the December 3, 2010 work plan.

I am cc'ing Connie on this email and requesting email verification from her, if appropriate, that nothing has changed in that regard and that no permits are required. She can be reached at 904-256-1652 if you would like to speak with her directly.

Kelsey

Kelsey Helton
DEP- Bureau of Waste Cleanup
Hazardous Waste Cleanup Section
Tallahassee, FL
850-245-8969

From: Taylor, Mark [mailto:Mark.Taylor@WestonSolutions.com]

Sent: Tuesday, January 25, 2011 1:04 PM
To: Helton, Kelsey
Cc: Wayne Reiber
Subject: FW: Tar Removal Project 1 Last Check on Permits

Hi Kelsey,

With the exception of the post excavation sampling plan, I am just making 1 last check to make sure we have met FDEP requirements for starting the Tar Removal Project and that no additional permission or no permits are required to move ahead with the project.

Mark

Mark Taylor
Weston Solutions, Inc.
904-261-3085

From: John Mousa [mailto:jjm@alachuacounty.us]
Sent: Tuesday, January 25, 2011 9:38 AM
To: Taylor, Mark
Subject: FW: Cabot Revised Pollution Prevention Plan for Tar Removal

From: Helton, Kelsey [mailto:Kelsey.Helton@dep.state.fl.us]
Sent: Wednesday, September 29, 2010 11:56 AM
To: John Mousa; robin.halbourg@alachuacounty.us
Cc: Helton, Kelsey; Webel, Connie; miller.scott@epamail.epa.gov
Subject: FW: Cabot Revised Pollution Prevention Plan for Tar Removal

John, Robin- Please see below NE District review response to Revised Pollution Prevention Plan for Cabot's proposed Tarry Sediment Removal. The referenced April 9, 2010 email to follow this one. If you decide to call Connie or Cabot and it can be arranged, I would like to participate in the call(s). I agree that the revised plan is much improved and anticipate few if any additional comments from DEP. I will be following up with an email to EPA next week as well regarding the revised proposal. Thanks-Kelsey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Webel, Connie
Sent: Thursday, August 26, 2010 1:02 PM
To: Helton, Kelsey
Cc: Fitzsimmons, Michael; Kershner, Matthew
Subject: RE: Revised Pollution Prevention Plan for Tar Removal

Yes, I think it will be sufficient given the work will be done in the drier season.

Connie Webel
Environmental Manager

From: Helton, Kelsey
Sent: Thursday, August 26, 2010 12:56 PM
To: Webel, Connie
Cc: Fitzsimmons, Michael; Kershner, Matthew; Helton, Kelsey
Subject: RE: Revised Pollution Prevention Plan for Tar Removal

Connie- Thank you. I think Cabot realized that hand digging was not realistic and that they also understood from State and local gov't feedback that they needed more specificity regarding surface water diversion/control and turbidity monitoring during excavation. Are you satisfied with the turbidity monitoring frequency and triggers for corrective action to address excessive turbidity pursuant to DEP regulations? I appreciate your feed back. - Kelsey

From: Webel, Connie
Sent: Thursday, August 26, 2010 11:38 AM
To: Helton, Kelsey
Cc: Fitzsimmons, Michael; Kershner, Matthew
Subject: RE: Revised Pollution Prevention Plan for Tar Removal

While the scope of work seems to have increased dramatically from the original proposal which had all excavation being done by hand, I believe that this proposal is still in the realm of the de minimus exemptions. It appears as though there should be only minimal if any impacts to wetlands, and the cleanup of the material is probably more beneficial than the temporary impacts that might occur from the cleanup.

Let me know if you need anything more.

Connie Webel
Environmental Manager

From: Helton, Kelsey
Sent: Monday, August 09, 2010 5:23 PM
To: Webel, Connie
Cc: Helton, Kelsey; Fitzsimmons, Michael; Kershner, Matthew
Subject: FW: Revised Pollution Prevention Plan for Tar Removal

Hi, Connie-

Attached is the revised- and more detailed- sediment removal workplan for contaminated sediments in Hogtown/Springstead creeks downstream of the Cabot Carbon/Koppers Superfund site. I think that the scope still meets the requirements of the de minimus exemption that you discussed in your previous April 9, 2010 email to me. Could you take a look and let me know if you have any comments or concerns within the next 2-3 weeks? Cabot plans on moving to implement the removal later in the Fall when it is drier with less surface water flow or rainfall events to manage.

THank you, I appreciate your time and continued support.

Kelsey Helton
DEP- Bureau of Waste Cleanup
Hazardous Waste Cleanup Section
Tallahassee, FL
850-245-8969

From: Taylor, Mark [Mark.Taylor@WestonSolutions.com]
Sent: Monday, July 26, 2010 1:27 PM
To: Scott Miller; Helton, Kelsey; John Mousa; Robin Hallbourg; Pearson, Stewart E.
Cc: Wayne Reiber; Bucky Thompson; Manu Sharma; Meghna Swamy
Subject: Revised Pollution Prevention Plan for Tar Removal

Attached for review and comment is the revised Pollution Prevention Plan for the Tar Removal from Springstead & Hogtown Creeks. Please feel free to contact Wayne Reiber or me with any questions that you have.

Best Regards,

Mark

Mark Taylor
[Weston Solutions, Inc.](#)
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