

**From:** [Helton, Kelsey](#)  
**To:** [John Mousa](#)  
**Cc:** [Helton, Kelsey](#)  
**Subject:** FW: Proposed Approach to the On Site Human Health Risk Assessment for Koppers Inc.pdf  
**Date:** Thursday, August 07, 2008 4:51:41 PM  
**Attachments:** [Proposed Approach to the On Site Human Health Risk Assessment for Koppers Inc.pdf](#)  
**Importance:** High

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John- Attached and in email below are DEP preliminary comments on the proposed risk assessment approach. Thanks- Kelsey

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole 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.*

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**From:** Helton, Kelsey  
**Sent:** Monday, August 04, 2008 3:08 PM  
**To:** 'Miller.Scott@epamail.epa.gov'; Brouman, Mitch  
**Cc:** Mora-Applegate, Ligia; Helton, Kelsey; Kean, Judie  
**Subject:** FW: Proposed Approach to the On Site Human Health Risk Assessment for Koppers Inc.pdf  
**Importance:** High

Scott-

Attached are DEP's initial review comments to the June 23, 2008 proposed onsite human health risk assessment approach for soils and sediments at the Koppers site in Gainesville, submitted by AMEC Earth & Environmental. Following DEP review of the recent July 30, 2008 RAF and MEE submittals from AMEC and the upcoming August 25<sup>th</sup> follow up conference call, DEP may provide additional review comments on the proposed approach.

Please note that based on discussion of the proposal with DEP management, the stipulations identified in Ms. Applegate's August 4, 2008 email below should be reflected in the final risk assessment approach. Please consider this email and attachment to represent formal DEP comments to date on the proposed approach.

We look forward to the August 25 follow up conference call and completion of the onsite risk assessment. We understand that the potential risk posed by offsite soils and sediments will be evaluated separately.

Thank you.

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

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**From:** Mora-Applegate, Ligia  
**Sent:** Monday, August 04, 2008 10:44 AM  
**To:** Helton, Kelsey  
**Cc:** Booeshaghi, Teresa; Kulakowski, Zoe  
**Subject:** Proposed Approach to the On Site Human Health Risk Assessment for Koppers Inc.pdf

Kelsey, As discussed with you and Steve, I concur with the detailed UF comments.

In a letter you need to specify to Beazer that we met with Management and these were the directions given:

- 1) FDEP's acceptable excess cancer risk level is  $1.0E-06$  and a HI of 1.0 for non-carcinogens.
- 2) FDEP will only accept values derived for Dioxin that use the Slope Factor from HEAST.
- 3) Relative bioavailability can be adjusted only if in vivo studies are conducted using Gainesville Koppers soils.
- 4) Exposure Units need to be redefined to make them more realistic i.e. smaller .
- 5) Evaluation of risks at the 95<sup>Th</sup> percentile is acceptable.