

From: Randy_Merchant@doh.state.fl.us
To: Anthony_Dennis@doh.state.fl.us
Cc: David_Krause@doh.state.fl.us; Sharon_Watkins@doh.state.fl.us; Lu_Grimm@doh.state.fl.us; Miller.Scott@epamail.epa.gov; John.Mousa
Subject: RE: Emailing: 1658_AMEC Beazer Draft Koppers Offsite Sampling Plan _10-02- 2008
Date: Wednesday, October 22, 2008 2:38:39 PM

Anthony:

I reviewed the attached October 2, 2008 AMEC Beazer Draft Off-Site Sampling Plan.

1. For both background and off-site surface soil samples, I recommend Beazer's consultant collect 0-3" deep rather than 0-6" deep. It's standard procedure for FL DOH and US Agency for Toxic Substances and Disease Registry to assess the health risk based on an analysis of the top three inches. Most people are only exposed to the top three inches. In addition, dust deposition is most likely contained in the top few inches of soil. Inclusion of deeper, uncontaminated soil has the potential to underestimate surface soil concentrations.

2. Before determining off-site surface soil sample locations, I recommend Beazer use an air dispersion model to estimate the area of dust deposition. Once the area of dust deposition is better defined, they can more accurately locate surface soil sample locations.

3. Instead of paired swale soil samples, I recommend just one soil sample at each swale location. The off-site surface soil samples (in #2, above) will likely be close enough to estimate the contribution from dust deposition.

To answer your questions:

1. Yes, if Beazer tests as planned with my suggested modifications, I will have confidence in estimating the current health threat. Because of the scarcity of past air testing, however, estimating the health threat from past inhalation exposures remains problematic.

2. The distance and area for background sampling appears sufficient.

3. As detailed above, I recommend Beazer utilize an air dispersion model to estimate the area of dust deposition before determining off-site surface soil sample locations.

Please let me know if I can be of any other assistance.

Randy Merchant, Environmental Health Florida Dept. of Health (850) 245-4299

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http://www.doh.state.fl.us/environment/community/hsec_survey.htm

-----Original Message-----

From: Dennis, Anthony D
Sent: Wednesday, October 15, 2008 12:25 PM
To: Merchant, E Randy
Cc: Watkins, Sharon M; Myers, Paul D
Subject: FW: Emailing: 1658_AMEC Beazer Draft Koppers Offsite Sampling Plan _10-02- 2008

Randy,

As we had discussed previously, can you review this "Off-Site Soil Sampling Plan" and provide any comment that I may present to John Musa from a Health Department perspective.

The foremost question I would have is; will the results of this plan be sufficient enough to determine if we have a health risk? Based on my review of the plan, I have these two questions; is the distance and area for the background sampling sufficient and secondly, is the distance and area for the off-site sampling sufficient? Is there adequate justification for this?

When the sampling is completed we, the Alachua County Health Department, will be asked the obvious question as to what is the health risk. The Alachua County EPD and the City of Gainesville will make the formal comments to the EPA regarding this plan as we have no authority with this site. Thanks Randy

Anthony Dennis
Environmental Health Director
Alachua County Health Department
Florida Department of Health
352-334-7930

-----Original Message-----

From: John Mousa [<mailto:JJM@alachuacounty.us>]
Sent: Tuesday, October 14, 2008 11:41 AM
To: Dennis, Anthony D
Subject: Emailing: 1658_AMEC Beazer Draft Koppers Offsite Sampling Plan _10-02- 2008

<<1658_AMEC Beazer Draft Koppers Offsite Sampling Plan _10-02-2008.pdf>> Anthony,

Here is the proposed Draft Offsite sampling plan that is being proposed by Beazer for the offsite Koppers sampling for contaminants.

ACEPD is reviewing this plan now, we have also contacted the city to get their Risk Assessment consultant involved and we are planning discussions to coordinate comments.

You may wish to get Randy Merchant involved.

John

The message is ready to be sent with the following file or link attachments:

1658_AMEC Beazer Draft Koppers Offsite Sampling Plan _10-02- 2008

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