



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

61 Forsyth Street

Atlanta, Georgia 30303-3104

November 12, 2013  
Mr. Gregory W. Council, P.E.  
Principal Engineer  
Tetra Tech  
1165 Sanctuary Parkway, Suite 270  
Alpharetta, GA 30009

Dear Mr. Council:

Thank you for the November 6, 2013, Pilot Plan Off-Site Soil Replacement for the Cabot Koppers Site (the Plan) that was submitted on behalf of Beazer East. We approve the Plan as submitted. Our comments on the Plan are as follows:

1. It would be helpful to include the signed remediation access agreement and any signed landscaping plan approvals for the property owner in the appendices so that all relevant documents are together in one place.
2. We appreciate the willingness expressed in the November 11, 2013, conference call to do additional sampling, if deemed necessary, at the Pilot Plan property as well as some other subset of parcels participating in the remediation nearby the former Koppers property line to address concerns with soils at depths below the planned one foot below surface remediation level. We look forward to receiving the offsite data report in the next few days to begin that discussion and sample planning.
3. As part of Section 2.5.1: It would be good for documentation purposes to list what analytical tests were completed for the borrow source soils.
4. On Figure 3, the existing tree icon is a solid green circle. However, two existing trees shown on the right-hand side of the plan use an empty circle, which implies that they are replacement trees and not existing trees. Please clarify this point.

If I may be of assistance in this matter, please contact me at (404)562-8819 or via Internet e-mail at [kestle.rusty@epa.gov](mailto:kestle.rusty@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Russell Kestle, Jr." followed by a flourish.

W. Russell Kestle, Jr., P.G.  
Remedial Project Manager  
Superfund Remedial Branch