



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

July 11, 2011

Dr. Paul Anderson
Vice President/Principal Scientist
ARCADIS U.S., Incorporated
2 Executive Drive, Suite 303
Chelmsford, MA 01824

Re: April 6, 2011, Off-Site Data Summary and Fingerprinting Evaluation
Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

Dear Dr. Anderson:

Thank you for the April 6, 2011, report entitled "Off-Site Data Summary and Fingerprinting Evaluation, Cabot Carbon/Koppers Superfund Site, Gainesville" (The Report). In an effort to expedite the completion of offsite soil sampling for delineation purposes, we are providing comment on the proposed additional offsite soil sampling and analysis in this letter. We will engage a conversation with you and Site stakeholders related to the fingerprinting analysis in future communications. Our comments are as follows:

2.1 Arsenic

The Report provides the following information related to arsenic concentrations in offsite sampling locations, "arsenic concentrations in almost all off-Site sampling locations were less than FDEP's default residential SCTL and were consistent with background concentrations indicates that delineation criteria have been met and that additional off-Site delineation of arsenic beyond the locations that have been sampled already is not required." We do not concur that arsenic concentrations nearby the Site have been adequately characterized. There has not been a statistically-valid background study of arsenic concentrations conducted that would allow one to state with acceptable certainty that arsenic concentrations in excess of residential default soil cleanup target levels (SCTLs) have been adequately delineated. Therefore, we require that additional arsenic delineation sampling take place on NW 26th Avenue and NW 31st Avenue west of current sampling data with exceedances of residential default standards. If Beazer East desires to undertake a background study of arsenic for regulatory compliance purposes, please provide a formal background study proposal for review and consideration.

2.2 Polycyclic Aromatic Hydrocarbons

2.2.1 West Off-Site Sampling

The Report provides information related to ARCADIS/Beazer East's belief that soil sampling locations at SS13, SS6, and SS7 "are not likely to be associated with the Site." We do not believe that the information presented in this Report definitively provides acceptable certainty that this statement is correct. There

has not been a statistically-valid background study of PAH concentrations conducted that would allow one to state with acceptable certainty that PAH concentrations in excess of residential default soil cleanup target levels (SCTLs) have been adequately delineated. We require that additional PAH sampling take place on NW 28th Avenue, and within the corridor of between NW 31st Lane and NW 32nd Avenue.

2.2.3 East Off-Site Samples

The Report indicates that the Ba-P TE concentration found at SS310 that exceeds default commercial standards for Ba-P TE because of other non-Site related sources. Regardless of whether one accepts this hypothesis for attribution, it is necessary to obtain further data to complete delineation nearby this sample point. We recommend that for this sampling, you consider utilizing the incremental soil sampling approach designed by a workgroup composed of Florida Department of Environmental Protection (FDEP) and EPA members that is included as an enclosure with this letter. As we have previously discussed with you, while the right-of-way samples reported here provide some indication that there is background here, they do not by themselves constitute a statistically-valid study that demonstrates that such a background exists. We believe that undertaking this approach, which has been demonstrated to produce statistically-valid results, and comparing that result with samples taken to establish possible Ba-P TEQ for delineation purposes enhances technical defensibility of soil sampling conducted for this cleanup.

2.2.4 South Off-Site Samples

All three locations to the South of the Site need to be delineated further. Therefore, we require that additional sampling for PAHs take place in the vicinity of locations SS307, SS308, and SS309. The soil sampling locations SS308 and SS309 are located in a residential area. Therefore, the appropriate benchmark for delineation criteria is the residential SCTLs for these samples.

2.3 Dioxins

2.3.1 West of Site

1. The residential busy street mean does not constitute an acceptable dioxin contaminant concentration for regulatory compliance purposes as use in a background calculation.
2. The following information is included in the Report related to a Site-specific residential SCTL calculated by ARCADIS on Beazer East's behalf:

"All TCDD-TEQ concentrations were also less than the Site-specific residential SCTL of 95 ng/kg (ARCADIS 2010c) which is based on Florida's statutory allowable risk level of one in one million (1×10^{-6}) (Figure 2-7)."

Neither EPA nor FDEP have accepted this Site-specific calculation as a Site-specific cleanup level for effecting a cleanup nearby the former Koppers property. Therefore, its continued use in comparisons to contaminant concentrations obtained from off-site soil sampling is meaningless for regulatory compliance purposes.

3. Due to exceedances of Florida residential soil CTLs, we believe that it is necessary to sample yards on the western side of NW 6th Street in order to fully delineate the extent of dioxin toxic equivalents (TEQ) associated with the former Koppers Site operations. Therefore, we require that additional soil sampling be conducted west of NW 6th Street from south of the NW 6th

Street and NW 26th Avenue intersection to the north at the intersection of NW 6th Street and NW 30th Avenue. We recommend that for this sampling that you consider utilizing the incremental soil sampling approach designed by a workgroup composed of Florida Department of Environmental Protection (FDEP) and EPA members that is included as an enclosure with this letter.

4. We believe that it is possible that there is some level of background dioxin TEQ and benzo(a)pyrene TEQ associated with areas such as NW 6th Street. As we have previously discussed with you, while the right-of-way samples reported here provide some indication that there may be background levels of Site-related contaminants there, they do not by themselves constitute a statistically-valid background study that demonstrates that such background exists for purposes of deriving a specific numerical background. We believe that any "busy street background" that would be present would likely be limited to the front yards of residences located directly on NW 6th Street. We support the proposal to conduct additional sampling if Beazer East desires that background levels be utilized in calculation of Koppers off-site cleanup levels nearby NW 6th Street. We recommend that for this sampling, you consider utilizing the incremental soil sampling approach designed by a workgroup composed of Florida Department of Environmental Protection (FDEP) and EPA members that is included as an enclosure with this letter. We believe that undertaking this approach, which has been demonstrated to produce statistically-valid results, and comparing that result with samples taken along NW 6th Street for delineation purposes enhances technical defensibility of soil sampling conducted for this cleanup.

3.2 Additional Samples South of the Site

We appreciate Beazer East's willingness to collect and analyze additional soil samples for TCDD-TEQ on NW 3rd Terrace and NW 2nd Street. In addition to collecting right-of-way samples, we require that Beazer East collect samples in residential yards that are next to the right-of-way samples. We desire that this round of sampling be the final round of sampling for delineation purposes.

3.3.3 Additional Samples West of the Site

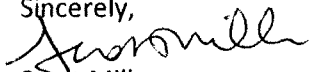
We appreciate Beazer East's willingness to collect and analyze additional soil samples for TCDD-TEQ on NW 31st Lane, NW 30th Avenue, and NW 27th Avenue. In addition to collecting right-of-way samples, we require that Beazer East collect samples in residential yards that are next to the right-of-way samples. We desire that this round of sampling be the final round of sampling for delineation purposes.

4. Conclusions – Recommended Additional Sampling

The Report includes a proposal for sampling and analyzing twelve additional soil samples from commercial areas and ten additional background samples from busy streets for TCDD-TEQ and PAHs. Please provide additional information that would demonstrate that the limited number of samples proposed along with previous sampling done would constitute a statistically-valid sample universe for the calculation of a demonstrable statistically-valid background concentration for regulatory compliance purposes. Alternatively, Beazer East may simply accept the default SCTLs for regulatory compliance purposes.

If we may be of further assistance in this matter, please contact me via Internet e-mail at miller.scott@epa.gov or via phone at (404) 562-9120.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Miller". The signature is written in a cursive style with a large initial "S".

Scott Miller

Remedial Project Manager

Superfund Remedial Branch, Section C

Superfund Division