

**From:** [Miller, Scott](#)  
**To:** [Helton, Kelsey](#); [Pearson, Stewart E.](#); [Schafer, Amy A.](#); [Cline Patricia](#); [John Mousa](#); [John Herbert](#); [Hutton Rick](#)  
**Cc:** [McCoy, Carrie](#)  
**Subject:** RE: Koppers EPA Proposed Sampling Locations Based on Conversations with Stakeholders/FDEP  
**Date:** Thursday, January 16, 2014 7:23:09 PM

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Kelsey,

Thank you for your follow-up to the previous e-mail. As we have communicated to the Department previously, the ARAR determination to implement the SCTLs does not provide that procedural components such as the grab sampling be implemented in lieu of EPA's routine approach to 5-point composite sampling. While we have here and routinely attempted to blend the two approaches where possible, we have determined that in this instance the composite sampling is the approach that is preferable as it is more mathematically defensible, is supported by community members over the grab sampling, and is more in keeping with how people and other potential receptors are exposed to potential remediation.

Thank you,

Scott Miller  
Remedial Project Manager  
Superfund Remedial Branch, Section C  
Superfund Division  
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**From:** Helton, Kelsey [mailto:[Kelsey.Helton@dep.state.fl.us](mailto:Kelsey.Helton@dep.state.fl.us)]  
**Sent:** Thursday, January 16, 2014 7:12 PM  
**To:** Miller, Scott; Pearson, Stewart E.; Schafer, Amy A.; Cline Patricia; John Mousa; John Herbert; Hutton Rick; Helton, Kelsey  
**Cc:** McCoy, Carrie  
**Subject:** RE: Koppers EPA Proposed Sampling Locations Based on Conversations with Stakeholders/FDEP

Scott-

I apologize for the delay in responding to your email below as I have been out of town and in training as you know.

There has been further discussion within the DEP Waste Cleanup Program regarding EPA's proposal for 5-point composite soil sampling to complete delineation of the lateral extent of offsite contamination exceeding the 7 ppt dioxin SCTL and to support development of final cut lines for the upcoming offsite soil removal. While we agree with the proposed sample locations and depth intervals, we do not support the use of 5-point composite sampling.

As previously communicated, the proposed composite sampling is not in compliance with Chapter

62-780. It is also not consistent with the previous offsite grab sampling protocol employed at this site, and composite sample results would not be directly comparable to grab samples. Finally, use of 5-point composite sampling to delineate contamination at the fringes of the soil contamination footprint has increased possibility of a false negative.

EPA also proposed 5-point composite sampling at the Charter school south of 23<sup>rd</sup> Avenue. While not in compliance with DEP rules, results from composite sampling on this property which is located further within the soil contaminant footprint are not likely to change the regulatory cleanup decision. Based on the higher dioxin soil concentrations at locations surrounding the school property, we anticipate that EPA will require remediation of the school property. As noted in previous EPA and DEP comments, sampling of that property is not necessary to further demonstrate that its remediation is appropriate.

Thank you for your consideration of DEP's previously recommended sampling locations, as reflected in the proposed scope of work below. We urge EPA to reconsider its proposed soil sampling protocol and request that EPA collect grab samples at the proposed locations.

Kelsey

Kelsey Helton  
DEP-Waste Cleanup Program  
Waste Cleanup Section  
Tallahassee, FL  
850-245-8969

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**From:** Miller, Scott [<mailto:Miller.Scott@epa.gov>]  
**Sent:** Monday, January 13, 2014 8:24 AM  
**To:** Pearson, Stewart E.; Schafer, Amy A.; Cline Patricia; John Mousa; John Herbert; Hutton Rick  
**Cc:** McCoy, Carrie; Helton, Kelsey  
**Subject:** Koppers EPA Proposed Sampling Locations Based on Conversations with Stakeholders/FDEP

Good morning, Folks,

Here are our proposed sampling locations based on your input. Kelsey will be unable to make our call this morning so I discussed these locations with her on Friday.

MSY sample on City property as far west, midway down west side abutting residential parcel – 2 composite samples one at depth, one in 6 inch.

Genesis School Yard – 2 composite shallow samples (1 composite in back, 1 in front)- may limit to one in front since the back and sideyard is paved. We can discuss this on our call.

Fenceline samples (C02) – 1 grab sample at 1'-2' only

Fenceline samples (B01, B02) – 2 grab samples at 1'-2' only

G Block – 2 composite shallow samples at G02,G03 in backyard at rear property line.

J Block – 2 composite shallow samples

K Block (K01 - Need Access) – 2 composite shallow samples

L Block (L01, L05 – Need Access) - 2 composite shallow samples, make a cut east to west at the J samples which runs across into L5 and require

Beazer East to either produce data/ICs or remedial action for all parcels North. L05 also has the benefit of being owned by the City of Gainesville. It looks either a park or vacant land or maybe some kind of car repair shop?

NW 6<sup>th</sup> Street – Pending Research on Where Samples Can be Collected, 2 shallow composite samples. Here are suggested spots based on feedback received and Google reviews.

(2816 nw 6<sup>th</sup> street, Electric Motor Repair, 372-0322

2838 nw 6<sup>th</sup> street, Gainesville Animal Hospital, 372-5366

Absolute Health Center, 2720 NW 6<sup>th</sup> Street, 371-1721)

Look forward to our discussion at 11:30 a.m. EST. I will likely be asking for your assistance in some way with respect to obtaining access agreements/other logisitcs. We are in a good situation in that we have access in hand for all but 5 properties. Attached is the updated EPA access agreement letter that will go out to obtain access.

As always, we appreciate your support! 😊

Thank you,

Scott Miller

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