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Subject: Off-Site Remedies / Cabot Carbon/Koppers FLD980709356
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Scott,

The ROD details, pages 130-131, that the options are; removal of soil w/ backfill or institutional and engineering controls as means to protect the population from contact w/ the contaminants. These options are industry standards for the intended purpose. For purposes of this inquiry assume that the backfill is equal in physical properties to the soil that is removed (i.e. bulk density, % solids, total carbon, grain size distribution, permeability, etc.) and in short will support the same plantings and provide the same rate of stormwater infiltration as the native soil. In the latter case, E & IC, the engineering controls will need to, in addition to the contaminate performance standard, be equal to the native soil in its ability to infiltrate stormwater for these to be equal remedies.

Also I know that more soil sampling is needed to delineate the contaminate boundary. It seems appropriate that additional sampling be included in future sampling work plans that will characterize the native soil so that the proper backfill specification can be developed for the eventual activity at the various sites.

I need to begin my investigation into the means and methods used at other superfund sites to achieve the E & IC for this project. Will you supply me with access to remedial design plans and specifications that are germane to this issue.

Thanks.