

From: [Pearson, Stewart E.](mailto:Pearson.Stewart.E)
To: Miller.Scott@epamail.epa.gov
Cc: [Murry, Fredrick J.](#); [John Mousa](#); [Hutton, Richard H.](#); Anthony.Dennis@doh.state.fl.us; [John Herbert](#)
Subject: RE: C/K ROD clarification - FLD980709356
Date: Tuesday, February 15, 2011 12:00:30 PM

In my review of the ROD several items arose that were unclear or required comment. Could you assist in providing clarity where needed? There is also some Errata listed at the end.

1. pg 39, Item 5.1.7.1, The article is silent on the recreational users in the creek. Shouldn't this group be included?
2. pg. 105, 9.3.4. Alt OfR-4. Contextually the narrative treats all property to the west of the site as private or commercial. The cost estimate uses 90 parcels as the basis for developing the cost of the activity and neglects the land between the private property and the edge of pavement (unpaved right of way). I estimate that the additional area of the right of way at 2 acres and will cost an additional \$180,000 to remove the contaminates from the right of way based on the residential process. I assuming that if the adjoining private residential property remediation is to excavate 2 ft bls and then backfill, the adjoining right of way will have process. Is this true?
3. pg 118, item 11.2.1.1. The 4th sentence identifies that the 'most contaminated soil' will be "treated" within the consolidated area. "Treated" is not defined and is an ambiguous term for purposes of understanding how it will reduce the volume, mobility or toxicity of the site contaminates.
4. pg 119, Item 11.2.1.4, paragraph 1, last sentence. This sentence indicates the stormwater basin is to be designed for future use. Future Use (Section 6) identifies the 'initial' land use to be industrial/commercial with recreational or mixed use with a residential component as additional uses that could be added in the future. Will the RP reserve land adjacent to the initial basin to accommodate the future additional use of the land?
5. pg 130, item 11.2.3.2. Sediment. The narrative focuses on the Cabot Tar Removal (Interim and Future) in its construction. The narrative is silent on Koppers responsibility or future actions by them?
6. Figure 14, Why are ISBS injection points shown on the North Lagoon and Drip Track areas? The remedy description does not include ISBS for the NL and DT areas.
7. Dialogue between the local agencies and EPA on the anticipated height of Consolidation Area (CA) has been ongoing for several months. The differences of opinion are a matter of concern. The Appendix, pages 219 and 376 suggest that the CA will be 40 acres in lieu of the 32 acres presented in Figure 14. The additional size may be appropriate considering additional delineation is needed on the PTW source areas. However the differences in height merited some conceptual modeling.

The results for the modeling show that the minimum height, including cover, for the consolidation area for the 32 and 40 acre foot prints ranges between 9 feet and 8 feet, respectively and the main slopes range between 1% and 1.2%, respectively. These results are based on the following assumptions:

Modeling on the CA mound for the 32 acre and 40 acre sizes has been performed to determine the height based on available data with the following assumptions:

- 15 ft. along the east boundary is reserved for Chemox injection
- 20+ ft of the east side of the CA is reserved for drainage conveyance for drainage from the east slope of the CA.
- The CA drains east and west from the center of the CA.
- The minimum slope of CA is equal to or greater than 1% for purposes of reducing infiltration.
- The cover for the contaminated soil in the CA is 1 foot of clean fill and 1 foot of engineered cap.
- Volume of soil from On-site, Off-site and ISS/S for the 32 acre CA is 238,440 CY as per the estimate.
- Volume of soil from On-site, Off-site and ISS/S for the 40 acre CA is 225,530 CY based on the assumption that the additional 8 acres in size reduces the On-site excavation by 4 acres.
- Swell of volume due to excavation and compaction is neglected.

8. I'm including some minor edit notes.

Errata

1. Page (pg) 37, Item 5.1.6.5, Second paragraph. The railroad spur diverts minor storm flows but is overtopped during major stormwater flow events.
2. pg 7, 13th bullet, Cabot not Beazer submitted the Tar Removal Plan
3. pg 18, 3rd Paragraph - City owned land (rights of way) are considered 'private' by the context of the narrative.
4. pg 42, Current and Future Land Use, The Murphree Well Field also supplies water to portions of Alachua County.
5. pg 96, 4th Para., UIC is Underground Injection Control. Add to acronyms.
6. pg 128, 5th Para., Define GAC = Granulated Activated Carbon. Add to acronyms

Thanks

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Sent: Tuesday, February 15, 2011 8:27 AM

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Subject: Reminder: Koppers Monthly Conference Call at 1 p.m. EST, Conference Call-in number: 866-299-3188, conf. code 4045628618

Thanks!

Scott Miller

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