



April 26, 2010

Mr. Scott Miller
Remedial Project Manager
Superfund Division
Superfund Remedial Branch
Section C
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

**Re: Amended Additional Off-Site Soil Sampling
South, East, Northeast and Non-Residential Background Locations
Cabot Carbon/Koppers Superfund Site
Gainesville, Florida**

Dear: Mr. Miller

On behalf of Beazer Inc. (Beazer), AMEC Earth and Environmental (AMEC) is providing this amended proposal for additional off-Site soil samples to the south, east and northeast of the Koppers (KI) portion of the Cabot Carbon/Koppers Superfund Site (Site) and several non-residential background locations in Gainesville, Florida. The proposed sampling locations presented in this letter supersede the proposed sampling locations presented in my February 19, 2010 letter to you. The sampling locations proposed in this plan reflect changes based upon comments from Dr. John Mousa of Alachua County Environmental Protection Department (ACEPD) dated March 17, 2010, comments from Ms. Kelsey Helton of the Florida Department of Environmental Protection (FDEP) dated April 15, 2010, and comments discussed during a conference call on April 15, 2010 attended by representatives of U.S. EPA, Beazer, FDEP, ACEPD, ARCADIS, AMEC, the City of Gainesville, and other stakeholders. The remainder of this letter responds to the key stakeholder comments and explains whether and how the proposed sampling plan was modified. Other than the modifications discussed below, the proposed additional off-Site sampling to the south, east, northeast and at non-residential background locations will follow the approach described in the February 19, 2010 letter to you.

Off-Site Sampling to the South, East and Northeast

Both FDEP and ACEPD requested that at least two more samples be collected to the northeast of the Site on the Department of Public Works property. As shown in **Figure 1**, two samples, located approximately 100 feet north of the Site boundary have been added to the northeast of the Site. Final sampling locations will be chosen in the field in consultation with US EPA. At these locations soil samples will be collected from the 0 – 6" depth interval in accordance with Chapter 62-780, F.A.C and submitted for analysis of dioxin/furans, PAHs, arsenic and pentachlorophenol following a standard 21-day turn-around time and in

accordance with previous documents and as described in the February 19, 2010 letter to you.

FDEP requested that a sample be added on the north-south street closest to the southeast corner of the Site. NE 1st Boulevard is the north-south street closest to that corner of the Site and a sample location is already proposed near that intersection (**Figure 1**). Adding an off-Site sampling location substantially closer to the southeast corner of the Site may be problematic because of the presence of the railroad right of way (ROW). Soils on the railroad ROW may have elevated constituent concentrations due to historic railroad activity, and thus will be avoided at this point in the investigation.

FDEP requested that a sample be added south of 23rd Avenue between NW 3rd Terrace and NW 2nd Street. As has been described previously, the goal of the initial phase of the off-Site sampling has been to collect soils from ROWs that are approximately 100 feet (or more) from the Site boundary. No ROW exists to the south of this portion of 23rd Avenue that would allow sampling at least 100' from the property boundary. Therefore, a sample could not be added at this location.

ACEPD requested that a sampling location be added to the southwest of the Site near the Wards Grocery store. A sample location has been added in this area (**Figure 1**).

ACEPD also requested that the sample locations to the northeast of the Site (one on North Main Terrace and the other on NE 33rd Avenue) be moved closer to the Site. This request will be evaluated in the field, and will be accommodated provided that the new locations will not be affected by confounding factors.

Background samples

ACEPD requested that the background sampling area along NW 13th Street be moved further away from the intersection with University Avenue, in part because ACEPD believes that the intersection is busier than those near the Site, and also in part because the area has recently been disturbed by construction activity. Given that recently disturbed soils have been avoided when collecting near Site samples, this request will be accommodated. ACEPD also requested that the southernmost area proposed for background sampling be eliminated because of its proximity to a coal gas plant remediation site and its location within an old industrial area. Collecting soils from "a very old industrial area" is appropriate for the purposes of establishing industrial background, which is one of the goals of the proposed pilot off-Site background sampling program. The other goal of the pilot background sampling program is to establish background concentrations near busy roads, such as NW 23rd Avenue and NW 6th Avenues, both of which are four-lane roads adjacent to or in close proximity to the Site. Nevertheless, because of ACEPD's stated concerns related to the proximity of the coal gas plant remediation, the southernmost area previously proposed for collection of background samples has been eliminated from the proposed sampling plan (**Figure 2**). In order to increase the diversity and number of streets from which background samples may be collected, the NW 13th Street and University Avenue areas designated for

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background sampling have been merged and expanded (**Figure 2**). Approximately five samples will be collected from within this area along major thoroughfares.

ACEPD also requested that the proposed background sampling in the Northeast Industrial Park area be reoriented to focus the sampling along NE 23rd Avenue instead of Waldo Road. ACEPD believes that traffic on Waldo Road may be greater than traffic that occurs near the Site. The samples to be collected from the Northeast Industrial Park area will be collected from well within the industrial park, and will be used to help characterize background concentrations for a commercial/industrial area, such as occurs to the east of the Site. The samples will not be collected immediately along the major roads that abut the Northeast Industrial Park. Thus, the area designated for background sampling to the east of the Site will remain as shown on **Figure 2**. Approximately three samples will be collected from within the industrial park.

Should you have any questions or concerns, please don't hesitate to contact Mitchell Brouman of Beazer (412-208-8805).

Sincerely,

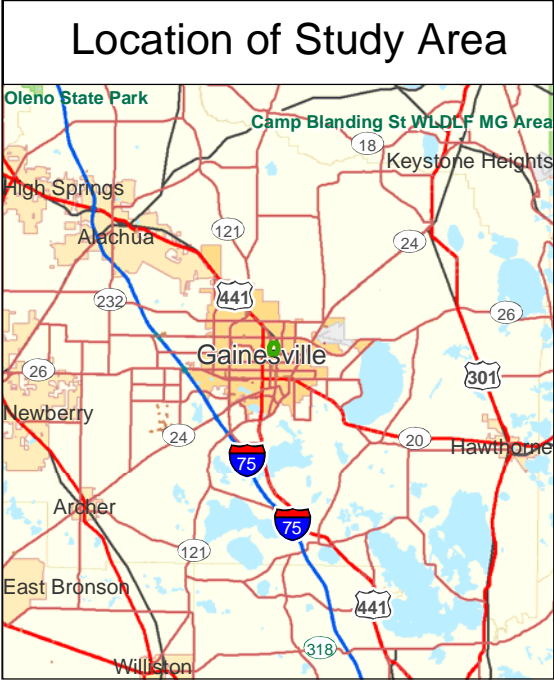
A handwritten signature in black ink, appearing to read 'Joe Robb', with a stylized flourish at the end.

Joseph Robb, P.G.
Associate Project Manager and Hydrogeologist
AMEC Earth and Environmental

Enclosure

cc:

Mitchell Brouman, Beazer East, Inc.
Paul Anderson, ARCADIS, Inc.
Greg Council, GeoTrans, Inc.
Tim Wolfson, Babst Calland Clements & Zomnir, PC



**Proposed Off-Site
Soil Sampling Locations
to the South, East, and Northeast**

**Cabot Carbon/Koppers Superfund Site
Gainesville, Florida**

**Beazer East, Inc.
Pittsburgh, Pennsylvania**

Notes & Sources

Aerial Imagery source: <http://nikos.alachua.fl.us>, 2005.

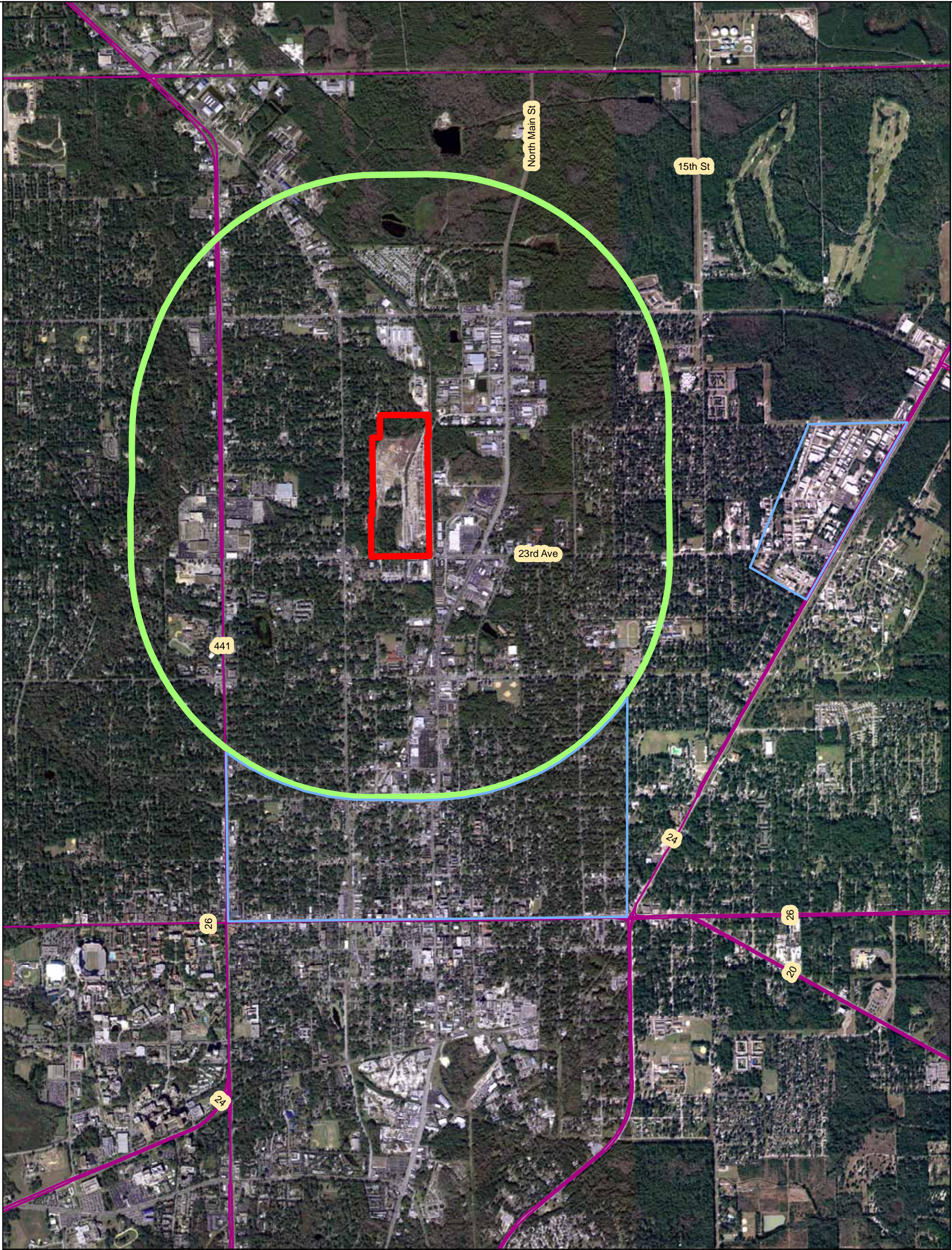
Legend

- Proposed Off-Site Soil Sampling Location
- ▭ Parcel Boundary
- ▭ KI Boundary

0 300
Feet

amec
AMEC Earth & Environmental, Inc.
2 Robbins Road
Westford, MA 01886
(978) 692-9090

N
FIGURE
1



LOCATION MAP



Figure 2

Proposed Background Sampling Areas

Beazer East, Inc.
Koppers Inc. Facility
Gainesville, Florida

LEGEND

- Property Boundary
- One Mile Site Radius
- Proposed Non-Residential Background Sampling Area
- Streets
- Highways



0 2,000 Feet



Notes: Aerial imagery from GeoTrans, Inc.
Street data from ESRI.
CAD & Data Source: GeoTrans, Inc.

AMEC Earth & Environmental, Inc.
Westford, Massachusetts