May 29, 2009

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: Additional Off-Site Soil Sampling
Cabot Carbon/Koppers Superfund Site
Gainesville, Florida

Dear: Mr. Miller

Beazer East, Inc. (Beazer) has reviewed the requested actions and concerns raised by stakeholders (U.S. Environmental Protection Agency (U.S. EPA), Florida Department of Environmental Protection (FDEP), Florida Department of Health, Alachua County, City of Gainesville and Gainesville Regional Utilities) on the May 19, 2009 stakeholder call related to the recent off-Site soil data for the Cabot Carbon/Koppers Superfund Site (Site) in Gainesville, Florida. In response to these requested actions and concerns AMEC Earth and Environmental (AMEC) has developed the following delineation sampling approach on behalf of Beazer.

The off-Site samples collected in February 2009 were collected along the western Site boundary within a few feet of the fence line, and at a distance of approximately 100 ft west of the Site boundary. Arsenic, PAHs and dioxins were detected in some 100-ft samples above their respective Florida Department of Environmental Protection (FDEP) residential Soil Cleanup Target Levels (SCTLs). We believe delineation as required by FDEP has already been achieved at the majority of locations and propose additional sampling to achieve delineation at other locations, as described in the following review:

- At locations SS06AA and SS07AA, benzo(a)pyrene toxic equivalents (BAPTE) and 2,3,7,8-tetrachlorodibenzo-p-dioxin toxic equivalents (TCDD-TEQ) were detected at concentrations slightly above their respective SCTLs. Delineation to the north is provided by sample SS05AA and delineation to the south and west is provided by sample SS08AA;

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- At location SS09A, the detection of arsenic (2.5 mg/kg) is only slightly above the SCTL of 2.1, and delineation to the west is demonstrated by the lack of arsenic detections above the SCTL in the majority (15 out of 17) of 100-ft samples. Delineation for the TCDD -TEQ detection will be provided by the additional sampling proposed below;
- At location SS10A, the detection of TCDD-TEQ is only slightly above the SCTL, and delineation of this detection will be provided by the additional sampling proposed below;
- At locations SS11AA, SS12AA and SS13AA, additional sampling will be performed along NW 28th Ave., NW 29th Ave. and NW 30th Ave. to delineate the western extent of TCDD -TEQ along the western boundary of the Site. Details of this sampling effort are provided below; and
- At locations SS15AA, delineation of arsenic and TCDD-TEQ above SCTLs is provided by results below SCTLs at locations SS14AA, SS16AA and SS17AA.

As shown in the attached Figure 1, the proposed additional sample points are located on NW 28th Ave., NW 29th Ave. and NW 30th Ave. at distances of approximately 150 ft, 200 ft, 250 ft and 300 ft from the Koppers Inc. Industries (KII) western boundary. The proposed sample locations will be marked in the field and U.S. EPA, FDEP, Alachua County and City of Gainesville will be invited to review the locations, as was done prior to the February 2009 sampling. Samples will be collected at all 12 proposed locations and submitted for laboratory analysis of dioxins/furans by U.S. EPA Method 1613B in accordance with the Quality Assurance Project Plan (QAPP) approved by the U.S. EPA on January 6th, 2009. In accordance with F.A.C 62-780 and as described in the EPA-approved workplan, a soil sample depth of 0-6" will be used to define surface soil.

Samples collected 200 ft from the fence line will be analyzed first, and the remainder of the samples will be put on hold. Laboratory analysis of the remaining additional samples from NW 28th Ave., NW 29th Ave. and NW 30th Ave will be made according to the following decision process:

- If the 200-ft sample along a particular street has a detection of TCDD-TEQ above the FDEP SCTL, successive samples moving away from the KII western boundary along that street will be analyzed (i.e., 250-ft, then 300-ft) until TCDD-TEQ results below the FDEP SCTL are obtained.
- If the 200-ft sample along a particular street does not have a detection of TCDD-TEQ above the FDEP SCTL, the sample collected 150-ft from the KII western boundary along that street will be analyzed.

The approach of collecting and holding some of the samples is consistent with Method 1613 as described in the QAPP, which allows for holding samples up to one year before extraction and one year before analysis.

Should you have any questions or concerns, please contact Mitchell Brourman of Beazer (412-208-8805) or me (978-692-9090, extension 223).

Sincerely,

Paul D. Anderson, Ph.D.
Vice President,
Technical Director, Risk Assessment
AMEC

Enclosure

cc: Mitchell Brourman, Beazer East, Inc.
Greg Council, GeoTrans, Inc.
Tim Wolfson, Babst Calland Clements & Zomnir, PC