



September 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: Summary of Additional On-Site Soil Sampling in Northern Currently Inactive Area and Proposed Additional Sample Locations
Koppers Industries Inc. Facility
Gainesville, Florida**

Dear: Mr. Miller

On behalf of Beazer Inc. (Beazer), AMEC Earth and Environmental (AMEC) is providing this summary of on-Site soil sampling results and proposed additional on-Site samples for the Koppers Inc. (KI) facility in Gainesville, Florida. Samples were collected in June 2009 at three locations in the Northern Currently Inactive Area (NCIA) of the KI facility. Soil samples were collected from 0 to 3 inches and 3 to 6 inches below ground surface (bgs) and analyzed for dioxins/furans by U.S. EPA Method 1613B, PAHs by U.S. EPA Method 8270C, pentachlorophenol by U.S. EPA Method 8270C, and arsenic by U.S. EPA Method 6020 and in accordance with the Quality Assurance Project Plan for the Revised Supplemental Soil and Sediment Sampling Plan – Additional Data for Risk Assessment (AMEC, 2006).

Detections above the Florida Department of Environmental Protection (FDEP) industrial Soil Cleanup Target Levels (SCTL) at sampling locations SS102, SS103 and SS104 are summarized in Figure 1. In order to better characterize the horizontal extent of constituents within, and potential risk associated with, the NCIA, Beazer proposes to collect five additional on-Site samples along the fence line, as shown in Figure 1. Soil samples will be collected from 0 to 6 inches below ground surface. Samples will be submitted for laboratory analysis of dioxins/furans by U.S. EPA Method 1613B, PAHs by U.S. EPA Method 8270C, pentachlorophenol by U.S. EPA Method 8270C, and arsenic by U.S. EPA Method 6020, in accordance with the Quality Assurance Project Plan for the Revised Supplemental Soil and Sediment Sampling Plan – Additional Data for Risk Assessment (AMEC, 2006). Once the analytical results have been validated, we plan to re-run the MEE model to revise the estimate of risk to on-site workers in the NCIA.

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

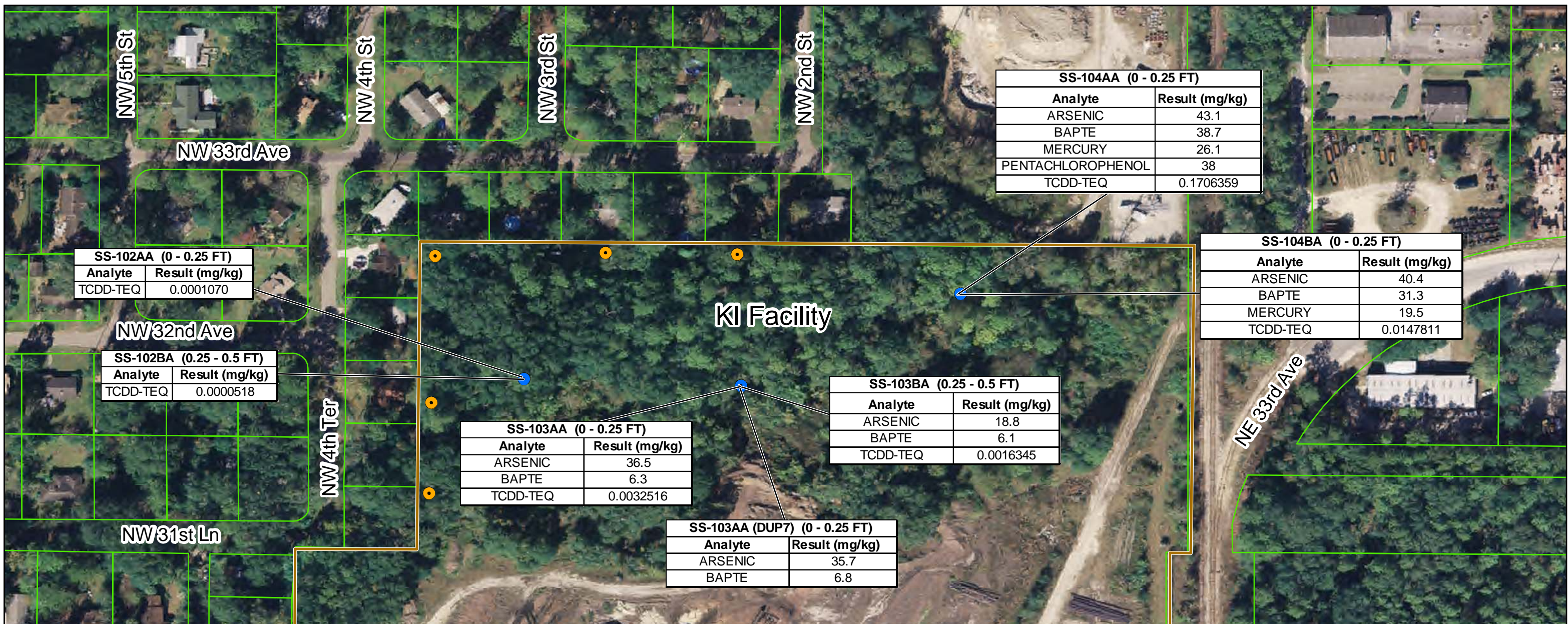
Sincerely,

A handwritten signature in black ink, appearing to read "Paul D. Anderson", with a long horizontal flourish extending to the right.

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

Enclosure

cc: Mitchell Brouman, Beazer East, Inc.
Greg Council, GeoTrans, Inc.



SS-104AA (0 - 0.25 FT)	
Analyte	Result (mg/kg)
ARSENIC	43.1
BAPTE	38.7
MERCURY	26.1
PENTACHLOROPHENOL	38
TCDD-TEQ	0.1706359

SS-102AA (0 - 0.25 FT)	
Analyte	Result (mg/kg)
TCDD-TEQ	0.0001070

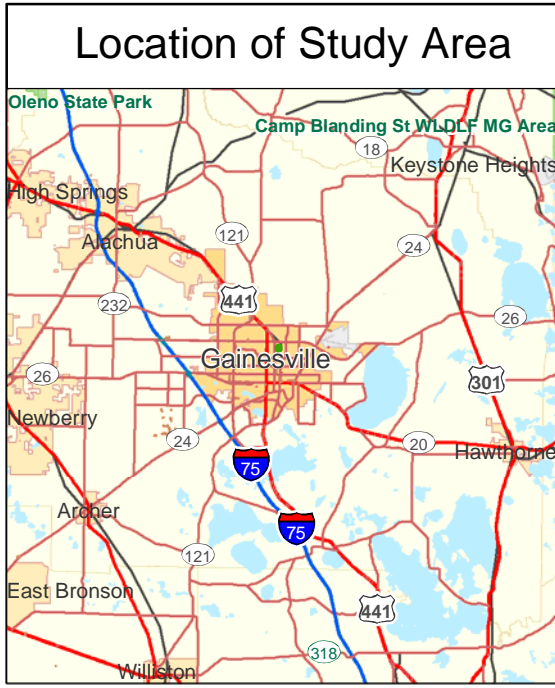
SS-104BA (0 - 0.25 FT)	
Analyte	Result (mg/kg)
ARSENIC	40.4
BAPTE	31.3
MERCURY	19.5
TCDD-TEQ	0.0147811

SS-102BA (0.25 - 0.5 FT)	
Analyte	Result (mg/kg)
TCDD-TEQ	0.0000518

SS-103BA (0.25 - 0.5 FT)	
Analyte	Result (mg/kg)
ARSENIC	18.8
BAPTE	6.1
TCDD-TEQ	0.0016345

SS-103AA (0 - 0.25 FT)	
Analyte	Result (mg/kg)
ARSENIC	36.5
BAPTE	6.3
TCDD-TEQ	0.0032516

SS-103AA (DUP7) (0 - 0.25 FT)	
Analyte	Result (mg/kg)
ARSENIC	35.7
BAPTE	6.8



**June 2009 On-Site Soil Sampling
Results and Proposed Sampling Locations**

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

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

Notes & Sources

 Aerial Imagery source: <http://nikos.alachua.fl.us>, 2005.
 Results shown are above the industrial direct exposure soil cleanup levels.

Legend

Sample Location (Depth in Feet)	
Analyte	Concentration of analyte in mg/kg
●	Existing On-Site Soil Sampling Location
●	Proposed On-Site Soil Sampling Location
	Parcel Boundary
	KI Boundary

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