

From: John Mousa
To: ["wayne_reiber@cabot-corp.com"](mailto:wayne_reiber@cabot-corp.com); Miller.Scott@epamail.epa.gov
Cc: ["msharma@gradientcorp.com"](mailto:msharma@gradientcorp.com); "Taylor, Mark"; "Helton, Kelsey"; [stewart.Pearson\(sep4310@gmail.com\)](mailto:stewart.Pearson(sep4310@gmail.com)); [Pearson, Stewart E.](#); [Murry, Fredrick J.](#); [Chris Bird](#)
Subject: ACEPD and City of Gainesville Public Works Comments on Updated Tar Removal Workplan Cabot Koppers Superfund Site dated Dec 3 2010 and Draft Fact Sheet
Date: Friday, December 10, 2010 8:52:00 AM
Attachments: [1658_City of Gainesville Comments on Updated Tar Removal Workplan Cabot 12-9-2010.pdf](#)

Scott,

ACEPD has reviewed the Update Creek Tar Removal Workplan and Fact Sheet submitted on December 3, 2010. ACEPD has discussed this workplan and fact sheets and our preliminary comments with Mr. Wayne Reiber of Cabot and Kelsey Helton of FDEP on a conference call on December 8, 2010. ACEPD has also solicited comments from the City of Gainesville Public Works Department. Subsequent to the conference call with Mr. Reiber, FDEP, Kelsey Helton, has submitted review comments to USEPA and Cabot on December 8 on the Work Plan and the Fact Sheet which included many of the issues that ACEPD had questions about.

In general, ACEPD agrees with FDEP comments and requests for clarification made in the December 8, 2010 communication. ACEPD overall generally approves of the scope and approach in the workplan, but requests that the FDEP comments and the below specific ACEPD and City of Gainesville PW issues be addressed prior to mobilization for the field.

ACEPD Workplan Comments:

1. The statement in the plan (Section 2.3.2, top of page 7) "the tar-affected sediments are not expected to be mobilized and brought to the surface" is not an accurate statement. Prior to the 2004 hurricanes many of the deposits of tarry materials were exposed in both Springstead and Hogtown Creeks. ACEPD staff sampled some of these materials between 1994 and 2000. The hurricanes in 2004, which occurred with very heavy rainfall and high water levels (stage) and flow in the creeks, eroded sediments in the upstream reaches of the creeks. These sediments moved downstream covering the tarry deposits with 6-12" or more of sand. It is likely that as sediments move through the system and eventually downstream, that these tarry deposits will again be exposed. Prior to the hurricanes in 2004 these deposits were exposed for at least 11 years. ACEPD requests that this statement be corrected.
2. Section 3.1.3, page 11 of workplan indicates that odor control and air monitoring will be implemented at the sediment excavation sites. As per FDEP request, ACEPD requests additional clarification on the types of air monitoring to be conducted at the excavation sites. This section also indicates that odor control efforts will include keeping stockpiles of excavated tarry sediment covered. However in section 3.2.2 page 13 of the workplan, there is a statement referring to the staging area that "the sediment will be placed on plastic sheeting and allowed to dry before transport to the disposal facility". ACEPD assumes that some type of odor control will need to be implemented at the staging area. If odor control is to involve covering the sediment pile, how are these sediments to dry out before transport? The odor control efforts at the staging area need to be described to clarify. ACEPD understands that the workplan does include odor control practices to be implemented at the excavation sites on private property near the creeks.
3. ACEPD requests that the reference to ACEPD be changed in the first sentence of
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1 paragraph of Section 3.2.2., page 13 of workplan, that states " Prior to excavation, Cabot and ACEPD personnel will use an insulated probe....." This sentence should be changed to state that "Prior to excavation, Cabot personnel will use an insulated soil probe rod to clearly delineate and mark the lateral and vertical extents of the area containing tar. ACEPD staff will provide limited assistance in this delineation effort". This is to make it clear that Cabot personnel are responsible for the work plan and that ACEPD is not performing the work but only providing assistance.

4. Section 3.2.2., page 13 of the work plan states "work will continue during rain events as long as the water can be kept away from the excavation zone and the safety of the workers is not compromised." ACEPD has serious concerns with this work approach from a safety perspective due to the unpredictable nature of stormwater flows in the creek during rain events. Once rainfall begins the creek water levels rise rapidly; plans should be enacted to have equipment and personnel out of the creek before rainfall begins if possible.
5. Pollution Prevention Plan Section 9.0, page 13 should include a language recognizing that permits (or notification) for tree removal or other activities may be needed from the City of Gainesville for stream access and restoration.
6. Public Outreach—The Workplan does not fully describe the public outreach or notification that is being planned to notify residents along the creek and the local community about the tar removal activities planned. This needs to be clarified and documented prior to mobilization. ACEPD understands that contact with specific property owners along the creek is planned to seek access to perform the work. In addition we understand that a FACT Sheet is being distributed to residents in the area. ACEPD is also agreeing to post the completed workplan and fact sheet on the County's website once finalized. Alachua County will also get a press release out if everyone agrees. ACEPD has the following additional recommendations;
 1. If the FACT sheet is to be mailed out prior to or during December, that the fact sheet be also mailed out or distributed to residents also in January to make sure they get the information. We are concerned that during the holiday season, these notices may not be seen because of people being out or being busy.
 2. The Fact Sheet should also be sent along with a letter briefly summarizing the project to the residents on the EPA mailing list used by EPA to communicate Koppers activities. Cabot should obtain this list from EPA.
 3. As per the City's comments, the wording of the fact sheet should be coordinated with the City of Gainesville's Public Information office.

ACEPD Fact Sheet Comments:

In addition to the FDEP Comments which ACEPD supports, ACEPD has the following comments:

1. Due to potential concerns from residents along the creek about health impacts from any noticeable odors generated during the excavation activities, ACEPD recommends that the name of Anthony Dennis, Environmental Health Director, Alachua County Health Department and his phone number 352-334-7931, e-mail, Anthony_Dennis@doh.state.fl.us be

included on the fact sheet underneath the name of John Mousa of ACEPD to address any health related concerns or questions from the residents.

2. The wording on health risks in the section on Clean-up Plan Elements should be changed. Recommended " Some odors may be noticeable near the work area. Odor control measures will be implemented to minimize odors. Air monitoring near the work areas will be conducted to assure the safety of the public and workers."
3. The wording on "Work areas to be restored." Needs to add that private properties impacted by access to the creek as well as creek work areas will be restored."
4. The reference to John Mousa should be , " John Mousa, Pollution Prevention Manager, Alachua County Environmental Protection Department. Tel: (352) 264-6805 e-mail: jjm@alachuacounty.us

Comments for the City of Gainesville, Stu Pearson, are attached.

Cabot or EPA may contact me or Stu Pearson with the City if they have any questions about our comments.

Thanks