



Alachua County Environmental Protection Department

Chris Bird, *Director*

September 22, 2011

Mr. Scott Miller
Remedial Project Manager
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: Recommendations and Comments on ARCADIS “Additional Off-Site Sampling West, South, Southeast and Residential Busy Street Locations Cabot Koppers Superfund Site , 8-31-2011

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) and the City of Gainesville (City) technical team have reviewed the above referenced proposal from ARCADIS for additional offsite and background soil sampling near the Cabot Koppers Superfund Site dated August 31, 2011. We have the following comments:

- 1) General Comment— ACEPD and the City believe it is critical that the delineation of the extent of offsite soil contamination near the former Koppers site be completed as quickly as possible in order to expedite the clean-up of offsite soils and relieve the uncertainty and concern of residents near the site. We have a serious concern about the continued use of a phased approach for completing the delineation of the extent of offsite soil contamination as proposed in the Arcadis workplan. We believe that this phased approach (involving taking primary and contingent samples from offsite locations but not analyzing the contingent samples until the results of the primary samples are known) will unnecessarily extend the time for completion of the delineation. We request that USEPA require that all primary and contingent samples be taken and analyzed in the same round of sampling so that as complete a data set can be obtained in the shortest time possible.
- 2) Arsenic Sampling—There appears to be an error on page 2 of the Arcadis report in that the additional two samples proposed to be taken along NW 26th Ave in Figure 1 (SS272 and SS272) are indicated as being along NW 27th Ave in the text.
- 3) Polyaromatic hydrocarbons (PAHs) Sampling
 - a. No explanation or rationale is provided in the plan for the location of proposed samples SS278 and SS279 along NW 23rd Ave southwest of the site. USEPA in its letter to Arcadis on July 11, 2011 indicated that additional delineation needed to occur near sample point SS307 which had relatively high levels of PAHs (8700 mg/Kg BaP-TEQ). While the location of proposed SS278 and SS279 will provide information about the extent of PAH contamination between the site boundary and Sample point SS307, these sampling points alone do not complete the delineation of contamination near SS307. We are recommending that additional locations near SS307 be sampled to complete the

delineation. These locations are shown in Figure 1 attached.

- b. Proposed samples SS350 /SS351 and SS352/SS353 along NW 3rd Terrace and NW 2nd Street respectively, should be analyzed as primary samples in the first round and not be contingent samples based on a determination as to whether the concentration in previous samples SS308 and SS309 is above a “busy street background”. (See Figure 1) Even if justification can be provided to consider the PAH concentration in samples SS308 and SS309 as being elevated due to proximity to a busy street (NW 23 Ave), it does not appear to be justified to apply busy street assumptions to samples taken along NW 3rd Terrace and NW 2nd Street nearly 200 and 300 ft from NW 23 rd Ave. Proposed sample locations SS352 and S352 along NW 3rd Terrace are definitely in a residential neighborhood along a quiet street and traffic conditions along NW 2nd Street are much lower than NW 23rd Ave.
 - c. USEPA’s July 11, 2011 letter to Beazer on the proposed offsite sampling required that additional sampling for PAH delineation take place in the corridor between NW 31st Lane and NW 32 Ave due to elevated data in Samples SS07 and SS06. The Arcadis report proposes to take additional right of way samples along NW 32 Ave. We believe that additional residential property samples within the corridor between NW 31st Lane and NW 32 Ave are also required to complete the delineation. (See Figure 1). In addition at least one right of way sample along NW 31st Lane should be added.
 - d. The Arcadis proposal of only one additional sampling location (SS354) to the east of site along NW 1st Blvd does not appear to be adequate to complete the delineation of PAH contamination to the east of the site. The USEPA in its July 11, 2011 letter recommended utilizing an incremental sampling approach to determine if the elevated concentration of PAH found in SS310 was background level or not. This approach is not proposed in the Arcadis report. We recommend that two additional sampling locations along NW 23rd Ave near SS310 be added to the sampling plan to complete the delineation. (See Figure 1.)
- 4) Dioxin --

We have concerns about the use of the Incremental Sampling Methodology (ISM) that was recommended by USEPA for sampling private properties due to the introduction of a different sampling technique in the middle of an ongoing delineation study. We are particularly concerned that the ISM is being proposed for testing of additional private properties located east of NW 6th Street in the area that was previously sampled using the single grab sample methodology. While the ISM approach would likely provide a better average concentration of soil contaminants on a property, we are concerned about the comparability and consistency of this composite data with previous individual grab sample testing data. Our concern relates to (1) how this composite data may be interpreted and compared to the existing individual grab samples in terms of defining the outer limit of the contamination, (2) whether there will be consistency among properties in determining whether or not an individual property is contaminated above FDEP SCTLs and , (3) whether or not an individual property would be subject to remediation. The changing of the sampling methodology and the use of this ISM approach will likely engender more uncertainty about the completeness of delineation and concern on the part of residents in the area about the reliability of the data and the contamination status of their properties.

We believe that if the ISM approach is to be utilized to define the limit of contamination, then it is critical that a solid correlation be developed between the two sampling methodologies. We

suggest that one way to perform this correlation would be to reconfirm by ISM testing the dioxin concentration on those properties and areas that have been previously tested with the individual grab sample method and where the grab sample testing has shown a dioxin value of at or near the FDEP SCTL of 7ppt and which are located at the outside edge of the contaminated zone. We recommend that these additional properties or areas be retested by ISM to provide this correlation data:

- a. At least one property along NW 33rd Ave north of the site where previous rights of way samples (SS01, SS02, SS03 and SS04) have shown dioxin concentrations less than 7 ppt. This would help reconfirm by ISM that in fact the northern edge of the contamination has been delineated.
- b. At least one property in the block between NW 33rd Ave and NW 32 Ave between NW 4th Terrace and NW 5th Street. This would reconfirm by ISM the edge of the contamination in this northwest direction.
- c. At least one property west of or near sample point SS52(6.9ppt) along NW 31st Ave and one property on or near sample point SS208(6.98ppt) on NW 31st Ave. This would reconfirm by ISM the edge of the plume between NW 31st Ave and NW 30th Ave.
- d. At least one property along NW 26th Ave and NW 4th Terrace where previous dioxin concentrations on several properties south of NW 26th Ave showed dioxin concentrations near 7 ppt. This would help reconfirm the extent of contamination to the south.

In addition to these recommended locations for ISM sampling for dioxins we recommend the following:

- e. East of NW 6th Street-- Consistent with the requirements in the USEPA July 11, 2011 letter , additional rights of way samples should be analyzed in addition to private property samples along NW 31st Lane and NW 30 Ave and NW 27th Ave east of 6th Street. (See Figure 2.)
- f. West of NW 6th Street-- An additional ISM sample location should be taken from a residential property along NW 30th Ave. These soils in this area are likely to be older than the newer multifamily sampling location proposed immediately south (ISM06) and would be more representative of any historical accumulation of dust contamination. (Figure 2)
- g. West of NW 6th Street -- An additional ISM sample location should be taken on the large parcel west of and adjacent to NW 6th St. between NW 26th Ave and NW 25th Ave. This property is currently in institutional use. An alternative would be the residential property further west. There are previous data points immediately across NW 6th St (SS256 and SS255) that exceed the residential FDEP criteria. (Figure 2)
- h. West of NW 6th Street -- There appears to be an error on Figure 3 of the Arcadis report in that there are two points with the same ID ISM07. This should be corrected.
- i. South of NW 23rd Ave-- The private school property at the corner of NW 2nd Street and NW 23rd Ave should be sampled with the ISM method. We suggest that Sample ISM17 could be moved further north to the location of ISM16 if ISM 16 is moved to be the private school property. (Figure 2)


- j. North and Northeast of Site—The Arcadis proposal does not appear to address the contamination at sample point SS300 (37.9ppt) that is above FDEP Residential (7ppt) and Commercial SCTL (30ppt) on the City of Gainesville property north of the Koppers site. The extent of contamination on this city property needs to be delineated. In addition the Arcadis workplan does not address the contamination near sample point SS 303(34ppt) in a commercial area on NE33rd Ave. Delineation should be performed in this area.

5) Proposed Additional Residential Busy Street Sampling

- a. It appears that Arcadis proposes to gather additional sampling points from “residential busy street” sampling locations to establish a “background” to be used for interpreting data along NW 6th Street. We are not convinced that any such acquired data would be a valid representative of background. The USEPA’s letter of July11, 2011 states that an ISM sampling approach could be undertaken to gather background data for developing a statistically valid residential busy street background. The Arcadis proposal does not propose this approach.
- b. In our opinion the proposed additional sampling locations are not a representative data set. There are too many sampling points proposed along E. University Avenue and Waldo Road intersection. This area is a much more commercial area and is not as residential as the area along NW 6th Street. This area also represents an older housing stock than the housing along NW 6th Street. We would recommend that if such a background data gathering effort is to be conducted, that the sampling locations should include some samples from residential areas further to the west and east of the site (e.g along NW 39th Ave or NW 16th Ave or NE 23 Ave or NE 16th Ave.). (See Figure 3.)

We appreciate the opportunity to comment on this sampling plan. If you have any questions or would like to discuss further, please feel free to contact me at 352-264-6805.

Sincerely,



John J. Mousa, Ph.D.

Pollution Prevention Manager

Attachments: Figure 1: Recommended Changes to PAH Sampling Locations

Figure 2: Recommended Changes to Dioxin Sampling Locations

Figure 3: Recommended Changes to Busy Street Sampling Locations

CC: Fred Murry, City of Gainesville

Robin Hallbourg

Pat Cline

Kelsey Helton, FDEP

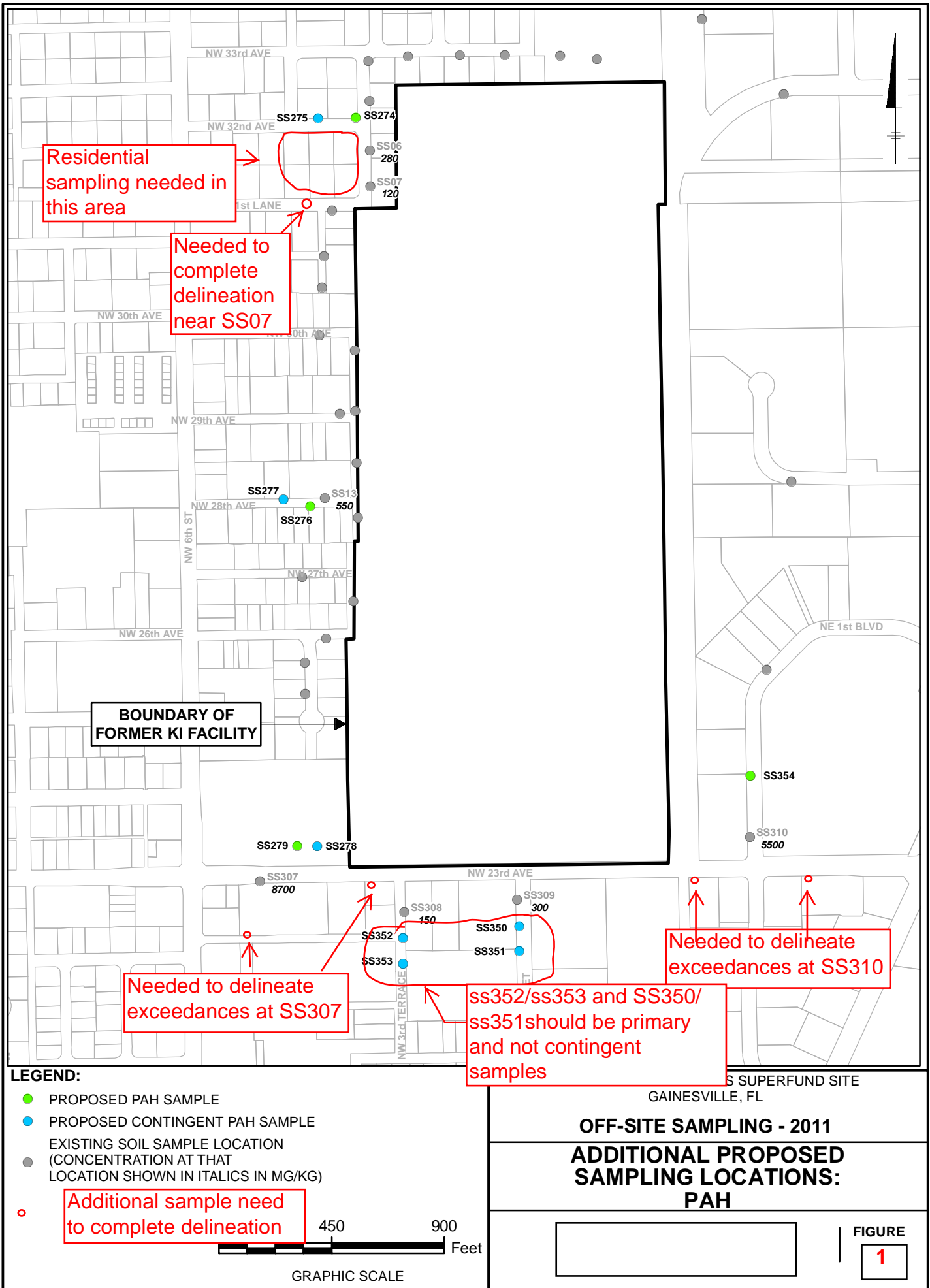
Rick Hutton, GRU

Stewart Pearson

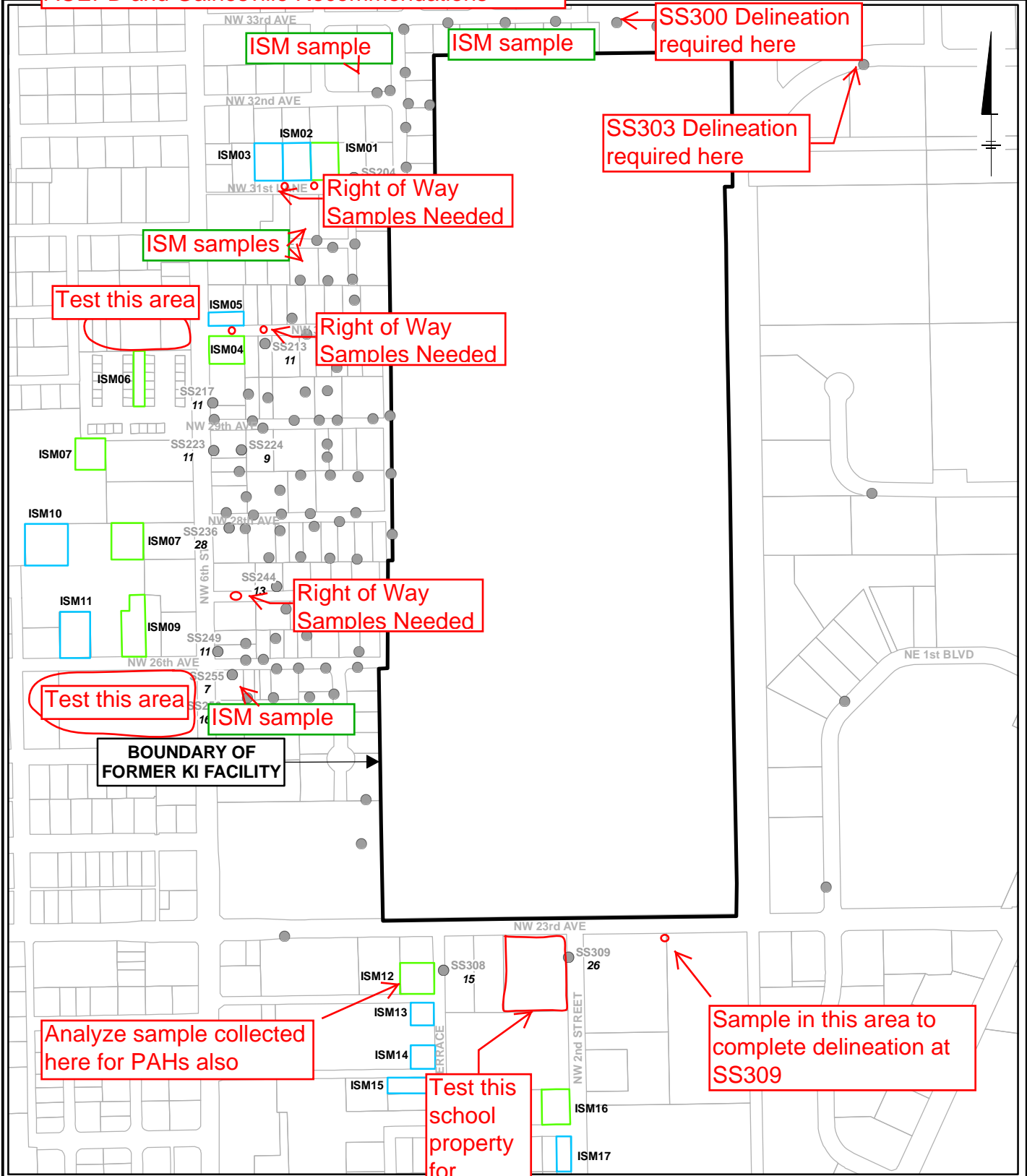
Anthony Dennis ACHD

Dean Williamson

Chris Bird, ACEPD



ACEPD and Gainesville Recommendations



LEGEND:

- EXISTING SOIL SAMPLE LOCATION (CONCENTRATION AT THAT LOCATION SHOWN IN ITALICS IN NG/KG)
- Additional sample need to complete delineation
- ISM SAMPLE
- ISM CONTINGENT SAMPLE



CABOT CARBON/KOPPERS SUPERFUND SITE
GAINESVILLE, FL

**OFF-SITE SAMPLING - 2011
ADDITIONAL PROPOSED
SAMPLING LOCATIONS:
DIOXINS/FURANS**

FIGURE
2

ACEPD and City of Gainesville Recommendations



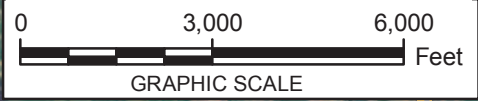
Take some samples from this area

Take some samples from this area

Take some samples from this area

Take some samples from this area

Too many samples from this area --not representative



LEGEND:

- 2010 BACKGROUND INDUSTRIAL SOIL SAMPLE LOCATION
- 2010 BACKGROUND BUSY STREET SOIL SAMPLE LOCATION
- ONE MILE SITE RADIUS
- PROPERTY BOUNDARY
- PROPOSED INDUSTRIAL BACKGROUND SAMPLING AREA
- PROPOSED RESIDENTIAL BUSY STREET BACKGROUND SAMPLING AREA
- PROPOSED BUSY STREET BACKGROUND SAMPLE
- BUSY STREET

CABOT CARBON/KOPPERS SUPERFUND SITE
GAINESVILLE, FL

**OFF-SITE SAMPLING - 2011
PROPOSED BUSY STREET
BACKGROUND SAMPLING
LOCATIONS**



**FIGURE
3**

CITY: SYR DIV/GROUP: IM DB: KES LD: PIC: PM: TM: RP
BP (G09BPNA.NJ23)
Q:\Beazer\Gainesville_FL\OffSiteSampling2011\mxd\ProposedBackgroundSamplingLocations.mxd - 8/12/2011