



Alachua County Environmental Protection Department

Chris Bird, *Director*

August 19, 2014

Mr. Scott Miller
Remedial Project Manager
US Environmental Protection Agency Region 4
61 Forsyth St., S.W.
Atlanta, GA 30303-8960

Re: Comments on Arcadis 2014 Addendum to Updated Off-site Soil Data Summary and Fingerprinting Evaluation: (2009-2013), Cabot Koppers Superfund Site

Dear Mr. Miller:

The Alachua County Environmental Protection Department and the City of Gainesville have reviewed the above referenced report and have the below comments and recommendations.

- 1) We agree with the report's conclusions that the extent of offsite soil contamination to the west and south of the site appears to have been delineated. Delineation to the east toward the former Cabot site appears to be incomplete since FDEP residential SCTLs have not been measured. This issue needs to be addressed in accordance with guidance from FDEP.

- 2) We disagree with the report's conclusion that the Dioxin-TEQ concentrations of 8 (ng/Kg) ppt, 10 ppt and 9 ppt measured in soils near three properties North of NW 21st Ave are not related to impacts from the former Koppers site. We acknowledge the extensive analysis performed in the report to determine if there are distinguishing patterns in the collected offsite soils dioxins data and understand that the data analysis performed does suggest possible alternate sources for the measured dioxins in these locations. However, we also believe that there is a substantial uncertainty and difficulty in trying to determine definitive attribution of contaminant sources to observed soil concentrations due to the high variability in analytical measurements and environmental sampling associated with dioxins testing at the low ppt level, as well as environmental degradation processes which can change component concentrations and fingerprints over time. We also note that the AT&T property immediately adjacent to and north of NW 21st Ave properties in question shows an adjacent 20 ppt concentration which the report indicates has a fingerprint pattern which matches the on-site contamination. It is not unreasonable to expect therefore that immediately adjacent properties to have some site impact. While there are some component ratios used in the report to support the

conclusion of non-site related sources to have impacted the results in these NW 21st Ave samples, there are also some contaminant ratios used in the fingerprinting analysis that indicate that the dioxin pattern observed in these samples to be similar to some on-site values.

Considering the uncertainty associated with trying to fingerprint low levels of dioxin contamination and the technical difficulties associated with determining the extent of contamination as one approaches background concentrations, we believe it is best to be consistent with previous practices and draw a bright line between concentrations that are predominantly above 7ppt and those that are below the 7 ppt criteria as indicated in the ROD. We recommend that the dividing line for the purpose of determining the properties that have been impacted by the former Koppers site should be the middle of NW 21st Ave. and that the properties north of NW 21st Ave with dioxin values above FDEP SCTLs near or adjacent be included in the remediation process.

- 3) Reviewing the dioxin TEQ values (using data from Beazer and USEPA) for samples collected West of NW 6th Street on commercial properties and averaging the USEPA and Beazer data in one sample location (8.5ppt, 7 ppt and 10 ppt) shows that the dioxins levels are below the FDEP Commercial Industrial SCTL of 30 ppt and very near the FDEP Residential SCTL of 7 ppt. Based on the location of these properties along busy NW 6th Street, their commercial uses and the limited human exposure to small unpaved areas on these properties, it may be possible to conclude that these small exceedance of FDEP Residential SCTLs are not significant risks. However, consistency with previous practice with properties to the East of NW 6th Street may require that either a deed restriction be placed on these properties to make sure they stay in commercial use or remediation to residential standards be performed.
- 4) The City has examined the Municipal Storage Yard (MSY) data and concludes that the weight of evidence of the fingerprinting evaluation shows that all MSY samples with TCDD-TEQ concentrations greater than 7 ppt are consistent with on-site Koppers sample results. Only two MSY samples with TCDD-TEQ > 7 ppt, shown on Figure 2-20, are allegedly potentially impacted by other sources of dioxin. However, the 1,2,3,7,8-PeCDD/OCDD ratio plot in Figure 2-19 and the total homologues ratio plot in Figure 2-21 confirm that the dioxin fingerprints of these 2 MSY samples are consistent with on-site samples; thus Figure ES-3 should be revised for consistency.

We appreciate the opportunity to comment on this fingerprinting report. Please let me know if you have any questions or concerns.

Sincerely,



John J. Mousa, Ph.D.

Pollution Prevention Manager

Cc: Fred Murry, Stu Pearson, Pat Cline, Anthony Dennis, Dean Williamson