

From: John Mousa
To: ["Council, Greg"](#); Mitch.Brouman@TRMI.Biz
Cc: [Miller, Scott \(Miller.Scott@epa.gov\)](mailto:Miller.Scott@epa.gov)
Subject: Final ACEPD Comments on Beazer Pilot Plan for Offsite Soil Replacement V1 11-6-2013
Date: Tuesday, November 12, 2013 4:00:00 PM

Mitch and Greg,

Here are the ACEPD comments discussed on the phone call today.

John

From: John Mousa
Sent: Tuesday, November 12, 2013 2:53 PM
To: Mitch.Brouman@TRMI.Biz
Subject: FW: ACEPD Comments on Beazer Pilot Plan for Offsite Soil Replacement V1 11-6-2013

From: John Mousa
Sent: Tuesday, November 12, 2013 11:27 AM
To: 'Miller, Scott'; Helton, Kelsey; Schafer, Amy A.; Hutton, Richard H; John Herbert; Pearson, Stewart E.; Cline Patricia
Cc: Kestle, Rusty; McCoy, Carrie
Subject: ACEPD Comments on Beazer Pilot Plan for Offsite Soil Replacement V1 11-6-2013

Scott and Rusty,

ACEPD has the following comments on the Beazer Pilot Plan for Offsite Soil Replacement V1 11-6-2013. These are preliminary comments for our phone call this afternoon.

- 1) Section 2.2.4 Dust Monitoring Equipment Setup -- Air monitors should be placed on each of the perimeters of the pilot project site, to provide assurance that fugitive dust is being controlled and not affecting neighboring residents. At a minimum, the northern and western boundaries should have a monitor in the center of the boundary. Not sure why it is necessary to have two monitors inside the home.
- 2) Section 2.3.3 Dust Control – Wetting of soils should be practiced at all times during the excavation and not done as an option when the monitors detect a problem with fugitive dust. The first sentence in this section should remove the phrase “if necessary” for use of water dust suppression. The second paragraph should add the word, “ Additional” in the following sentence, “Whenever an instantaneous or time average dust concentration alarm is triggered, additional dust control measures will be considered”
- 3) Section 2.5.2 Field Check and Criteria for Acceptance and Section 2.3.1 Excavation Procedures and Equipment -- It is not clear whether 2 ft of soil will be removed from the 15 ft Beazer property on the east of the subject property. In one text location (p. 10) it is stated that the 2 ft depth will not include the entire 15 ft width and in the later section

2.5.2 it is stated that the 2 ft depth will be verified. It is not clear why the entire 15 ft wide section is not to be excavated to 2 feet depth. What is the justification for a tapering depth on this section? ACEPD recommends that the entire 2 feet depth be removed.

- 4) Laboratory Testing of Fill Soil for Dioxins -- The laboratory test results for dioxins show that the Dioxin TEQ values were calculated using a “zero” value for dioxin congeners that were not detected. This is not consistent with way that all other soil samples taken either on site or offsite were calculated. The standard practice so far has been to use ½ the detection limit for the ND congeners and to use this value with toxicity factor to calculate the Dioxin TEQ. The method used by the lab will give a minimum value for dioxin and not a more conservative maximum value for dioxins. The data should be calculated consistently with previous analyses.
- 5) Confirmation Sampling – Confirmation sampling of the soils below the 1 foot depth on the pilot property should be performed to verify the removal of contaminated soils.
- 6) Section 2.2.5 On-Property Access Roads and Stockpiles-- The clean soil stock pile should be covered to prevent contamination from contaminated on site dust. The removed soil management area should be covered to prevent contaminated dust and soil from being blown by winds to the surrounding properties.
- 7) Section 2.3.1 Excavation Procedures and Equipment-- The statement is made that “ a thin layer” of soil will be removed within 1 foot of pavement and within 2 feet of permanent buildings. This depth needs to be defined and it is recommended that this depth be at least 6 inches of soil to be removed in these areas.
- 8) Dump trucks and Roll off Bins—All dump trucks and roll off bins need to have maximum dust control employed including load covers or equivalent to minimize potential for dust generation.
- 9) Please provide documentation in text of how barrow soil samples (clean fill samples) were taken and who sent them to lab and when.
- 10) Please consider draining and removal or filling with sand of any underground fuel oil storage tanks encountered in soil remediation on properties.

These are preliminary comments and there may be more later.

John

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