

From: John Mousa
To: [Miller, Scott \(Miller.Scott@epa.gov\)](mailto:Miller.Scott@epa.gov)
Cc: [Kestle, Rusty](#); [Kelsey Helton \(Kelsey.Helton@dep.state.fl.us\)](mailto:Kelsey.Helton@dep.state.fl.us); [Richard H. Hutton](#); [Cline Patricia](#); [Stewart Pearson \(pearsonse@cityofgainesville.org\)](mailto:Stewart.Pearson@pearsonse@cityofgainesville.org); [Carrie McCoy \(McCoyCE2@bv.com\)](mailto:Carrie.McCoy@bv.com); [Hayes, Joshua](#); [John Herbert](#); [Greg Council](#)
Subject: ACEPD Comments on TetraTech Pre-Design Investigation Workplan Design Track 2
Date: Monday, June 01, 2015 9:20:00 AM
Attachments: [ROD Table 8 p.151 .png](#)

Scott,

Alachua County EPD has the following comments in regards to the proposed drainage ditch sampling planned in the May13, 2015 TetraTech Pre-Investigation Workplan Design Track 2 for the former Koppers Superfund site.

- 1) The workplan proposes to sample and analyze sediment samples from the drainage ditch which conveys Beazer site stormwater discharges through the City of Gainesville Municipal Storage Yard and eventually into Springstead Creek. Table 4 indicates that only Pentachlorophenol and PAHs will be analyzed for in these samples. ACEPD requests that dioxins/furans, arsenic and BAPTE be added to the testing list consistent with Table 8 of the ROD and the fact that these COCs have been historically documented at elevated levels in the on-site portion of the drainage ditch. The City of Gainesville has performed testing on one drainage ditch sediment sample on the MSY property and has obtained a result of 439 ng/Kg (ppt) dioxin TEQ. Our concern for testing and remediating any unsafe levels of dioxins, arsenic, BAPTE and PAHs in the ditch sediments is also based on the fact the ditch is usually dry and not submerged and may be accessible to humans and wildlife. In addition, the future redevelopment of this City MSY property may involve recreational uses.
- 2) The Introduction of the Workplan states that one of the goals of this work effort is the “sampling and testing of sediment downstream of the Koppers facility to determine if the sediments are impacted at levels greater than cleanup goals”. ACEPD would propose that further sampling and testing of the sediments in Springstead and Hogtown creek for the COCs listed in Table 8 of the ROD would be appropriate to include in this workplan and the results compared to human health and ecological risk cleanup goals. FDEP has stated that there is insufficient data to establish that there is no risk to human health and ecological organisms in the Springstead and Hogtown Creek systems downstream from the Koppers and Cabot sites and further testing is required.
- 3) In the ROD, there are references to Probable Effects Concentrations and TECs and there are also references to FDEP Default Leachability for Fresh Water in the section referring to sediment clean goals. Some sediment sections of the ROD appear to primarily referring to the sediments in Springstead and Hogtown Creek and may not

address the conditions in the more exposed drainage ditch. Section 7.1.5 of the ROD states that “ Florida default leachability SCTLs for protection of ecological organisms in surface water are used for sediment in Springstead and Hogtown Creeks.” The ROD indicates that cleanup goal for pentachlorophenol in sediments in Table 8 of the ROD is the FDEP Default Leachability Based on Fresh Water Surface Water Criteria SCTL of 0.2 mg/Kg. This value is specified as protective of Ecological Organisms. It should be noted that the FDEP also specifies a FDEP Default Fresh Water Surface Water Leachability SCTL for Dioxins (TEQ) of 0.6 ppt, which is a very low concentration. It is not clear what cleanup goals would be used for dioxins and other contaminants in the ditch and creek sediments that are both protective of human health and ecological organisms.

- 4) Section 1.3.4 of the Workplan refers to the fact that naphthalene degrades relatively rapidly in groundwater under aerobic conditions. However in the anaerobic conditions in the groundwater at the Koppers site this is not the case. This section should be clarified.

John J. Mousa, Ph.D
Pollution Prevention Manager
Alachua County Environmental Protection Department
408 W. University Ave. , Suite 106
Gainesville, FL 32601
352-264-6805