



# Alachua County Environmental Protection Department

Chris Bird, Director

November 19, 2007

Mr. Scott Miller  
Remedial Project Manager  
Waste Management Division  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303

RE: ACEPD Comments on Technology Screening-Feasibility Study Meeting Notes -- October 29, 2007

Based on review of the meeting notes dated October 29, 2007 from the USEPA-Beazer Technology Screening-Feasibility Study meeting held on October 4-5, 2007, Alachua County Environmental Protection Department (ACEPD) has the following comments:

1. Meeting notes indicate that confirmatory results for dioxin/furan testing in surface soils on Koppers site were not available at time of meeting. Recent confirmed results indicate that dioxin/furan levels in surface soils on site are higher than FDEP commercial and residential default clean-up levels at the western and eastern boundaries of the site and especially higher in some source areas on site. Offsite soil and sediment sampling to determine the risks to residents and workers on the properties bordering the Koppers site needs to be addressed.
2. Figure 4 in the meeting notes shows average surface soil concentrations for arsenic and benzo-a-pyrene TEQ in the top 2 feet of soil. Soil concentration data was also collected from the top 3 and 6 inches and from 6 inches to 2 feet in most of the locations sampled on-site. In several of the sampling locations, the concentration of contaminants such as benzo-a-pyrene, dioxin/furan and arsenic is higher in the shallower 3 inch and 6 inch soil horizon samples than in the deeper samples. ACEPD requests that consideration be seriously given to evaluating the risks from the shallow 3 to 6 inch depth soils independent of deeper soils when evaluating potential pathways and feasible remedies.
3. Clean-up Criteria —The meeting notes indicate that "concern was expressed over the Florida Dioxin/Furan 30 ppt clean-up level". ACEPD supports the applicability of FDEP Clean-up standards for this site.
4. Risk Assessment Issue – In light of the updated feasibility study being undertaken, ACEPD would like to receive further clarification as the status of Risk Assessments that have been or are going to be performed at the Koppers site. Is there going to be an updated Risk Assessment document for this site that evaluates the new data that has been obtained over the last few years? ACEPD understands that the new soil sampling data is or will be used to update the soil risk assessment, but is unsure of the status for the other media. The draft Combined Beazer USEPA Schedule of project activities dated 10/10/07 does not indicate a revision to the risk assessment or additional risk assessment activities.
5. Joint FS Schedule – The Joint FS Schedule shown in the meeting notes does not appear to provide a specific time for public meetings in the local community to solicit feedback from elected

---

201 SE 2<sup>nd</sup> Avenue Suite 201 ■ Gainesville, Florida 32601 ■ Tel. (352) 264-6800 ■ Fax (352) 264-6852  
Suncom 651-6800 ■ TDD (352) 491-4430  
Home Page: [www.environment.alachua.fl.us](http://www.environment.alachua.fl.us)

An Equal Opportunity Employer M.F.V.D.

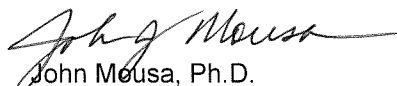


officials and the community on the any proposed draft ROD Amendment. There is a 50 day public comment period in the schedule, but this time period appears too short to allow for appropriate review and comment including public meetings. Previous proposed ROD Amendments in 2001 generated an increased level of public interest. Perhaps a 90 day period would be more appropriate.

6. ACEPD questions why off-site incineration is not being considered for a treatment technology for removed soil/ DNAPL? This option was evaluated by Beazer in an earlier report and seems feasible and should remain on the list.
7. Please provide explanation of the reference to "landban –Canada" in the option for Off-site landfill for soil and solid residue. Is "offsite landfill" still a option that has not been excluded?
8. Water Disposal Options – The discharge of treated water to Springstead Creek or other local waterway is not recommended. Treated water should be discharged to a POTW or recirculated on-site as part of the remediation activities.
9. ACEPD recommends that the physical removal of impacted soils by excavation in the Hawthorn be left on the list of groundwater remediation technologies evaluated. At the FDOT Fairbanks site northeast of Gainesville, soil was excavated to a depth of ~32 feet below land surface, which at that site was the top of the Hawthorn Group. Soil removal of Hawthorn Group materials may be an option to further evaluate.
10. Other Area of Concern -- ACEPD continues to be concerned about the contamination detected in UTZ well FW-12B that increases with depth. This coupled with the reported detection of naphthalene in samples from LTZ well FW-23C down gradient of FW-12B in the Floridan aquifer remains cause for concern. Concentrations from the July 2007 sampling of FW-23C show naphthalene to be present at 14 ug/L equivalent to the Florida GCTL, in Zone 1 and present at 5.7 ug/L in Zone 2. The source and vertical extent of contamination in FW-12B has not been determined and continues to pose a threat to water quality in the Floridan aquifer.

Please call if you have any questions, or we can discuss these on the November 27, 2007 phone conference call.

Sincerely,

  
John Mousa, Ph.D.  
Pollution Prevention Manager

CC: Rick Hutton, Gainesville Regional Utilities  
Mitch Brouman, Beazer East  
Kelsey Helton, FDEP