



Alachua County Environmental Protection Department

Chris Bird, Director

March 17, 2010

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

Re: ACEPD Comments on Additional Off-Site Soil Sampling – Western Grid Cabot Carbon/Koppers Superfund Site Gainesville, Florida and Additional Off-Site Soil Sampling South, East, Northeast and Non-Residential Background Locations Cabot Carbon/Koppers Superfund Site Gainesville, Florida prepared by AMEC Earth & Environment, Inc. and dated February 19, 2010

Dear Scott:

The Alachua County Environmental Protection Department (ACEPD) has reviewed and has the following comments on the documents “Additional Off-Site Soil Sampling – Western Grid Cabot Carbon/Koppers Superfund Site Gainesville Florida” and “Additional Off-Site Soil Sampling South, East, Northeast and Non-Residential Background Locations Cabot Carbon/Koppers Superfund Site Gainesville, Florida,” prepared by AMEC Earth & Environmental, Inc. Westford, Massachusetts February 19, 2010. These plans provide sites for additional soil sampling surrounding the Koppers site and at selected proposed “background” commercial and industrial areas in Gainesville.

“Additional Off-Site Soil Sampling – Western Grid Cabot Carbon/Koppers Superfund Site Gainesville Florida”

- 1) Based on recently received dioxin sample information on northern boundary on-site samples at the Koppers site (Samples SS -107, SS-108 and SS-109), it appears that dioxin levels are close to or below the FDEP default residential SCTL(7ppt). The levels in the right of way (ROW) on NW 33rd Avenue north of the residential parcels that are immediately adjacent to the northern Koppers boundary are all less than 7 ng/kg. While this is evidence that contamination levels above SCTLs may not have impacted the adjacent residential parcels, nevertheless, ACEPD believes it is important that residential properties adjacent to the northern boundary be sampled especially because high levels of dioxin have been found in the northern inactive area and in order to better assure property owners that their parcels have not been impacted.

- 2) ACEPD recommends adding at least one additional sampling location west of the western most proposed sampling location on north side of NW 31st Avenue. This will provide assurance that the western extent of the contamination has been achieved.
- 3) Some of the proposed locations are on the boundary of two parcels, where this is the case and there are two or more sites proposed on a given parcel, ACEPD recommends relocating one or more to an adjacent parcel that has no proposed sampling locations. Examples of this can be seen on the south side of NW 28th Avenue (Figure 1 of the proposed plan).

“Additional Off-Site Soil Sampling South, East, Northeast and Non-Residential Background Locations Cabot Carbon/Koppers Superfund Site Gainesville, Florida”

- 1) In addition to the eight proposed soil sampling locations to south, east and northeast of the Koppers facility, ACEPD requests addition of a sampling location along NW 23rd Avenue closer to the Wards Grocery nearer to the intersection of NW 23rd Avenue east of NW 6th Street.
- 2) Due to the high levels of contamination with dioxin, pentachlorophenol, and arsenic reported in the northern inactive area (SS-104) at levels which significantly exceed FDEP industrial default SCTLs, and since sample SS-104 is within 75 to 100 ft of the northern boundary and since no boundary samples were analyzed from the north-northeastern corner of the site, ACEPD recommends that 1) an additional off-site sample location be included from the City of Gainesville Public Works property north-northeast of the Koppers site, and 2) that sample points to the northeast of the site along NE 33rd Ave and N. Main Terrace be moved closer to the site boundary as they appear to be approximately 300 feet away from the site. The City property is publically owned property similar to other rights of way that are being sampled. ACEPD also recommends that additional on-site boundary sampling along the north-northeastern boundary of the site be performed.
- 3) ACEPD recommends relocating the background sampling area proposed on NW 13th Street further north, away from the intersection with University Avenue. University Avenue has much more traffic and a greater amount of truck traffic that can potentially impact soils when compared with NW 6th Street and NW 23rd Avenue in the Koppers area and the area may not be a representative “background’ location. This area of 13th Street has seen a significant amount of soil disturbance near the intersection with University Ave due the demolition, construction and contamination removal activities that recently occurred on this corner.

ACEPD also recommends that background samples collected from the proposed area on west University Avenue be collected off the main road along side streets, to reduce the potential for these areas to be artificially influenced by greater road traffic. Both of these areas (NW 13th Street and University Avenue) have curb and gutter systems, with sidewalks, leaving little exposed soils in the ROW for sampling. It may be difficult to find a good sampling location in this area unless one goes off the main road slightly.

- 4) ACEPD recommends changing the location of sampling in the Northeast Industrial Park area along Waldo Rd to re-orient the primary sampling area to be along NE 23rd Ave. (See Attached Figure). This is a mixed commercial and industrial area along the same road as the Koppers site and would be more representative of these areas. One could go north into the industrial park slightly if needed, but care needs to be taken not to select samples from areas that may have been impacted by contamination by the automotive and other businesses in the park. ACEPD recommends locating sampling sites in the proposed Northeast Industrial Park away from Waldo Road. Again, Waldo road receives more traffic and different types of traffic (more diesel trucks) than either NW 6th Street or NW 23rd Avenue.

- 5) ACEPD does not recommend the proposed southernmost background sampling area shown in Figure 2 which is near the GRU power plant and the old Gainesville Gas Coal Gas plant remediation as a suitable background location. This area is a very old industrial area that has likely been impacted by coal tar and petroleum contamination from an old coal gasification plant near Depot Avenue. This site is under active remediation now. ACEPD recommends that this background sampling area could be located further south along South Main Street in a mixed commercial and industrial zone that has similar soil types and further away from the influence of the old coal gasification plant. See Attached Figure.

We thank you for the opportunity to comment and provide input on the workplans and appreciate USEPA's continued commitment to a comprehensive remedy for the contamination at this site. Please contact me at 352-264-6805 or via e-mail at jjm@alachuacounty.us if you have any questions or concerns.

Sincerely,



John J. Mousa, Ph.D.
Pollution Prevention Manager

CC: Fred Murry, Asst. City Manager, Gainesville
Stu Pearson, City of Gainesville
Rick Hutton, GRU
Kelsey Helton, FDEP
Pat Cline
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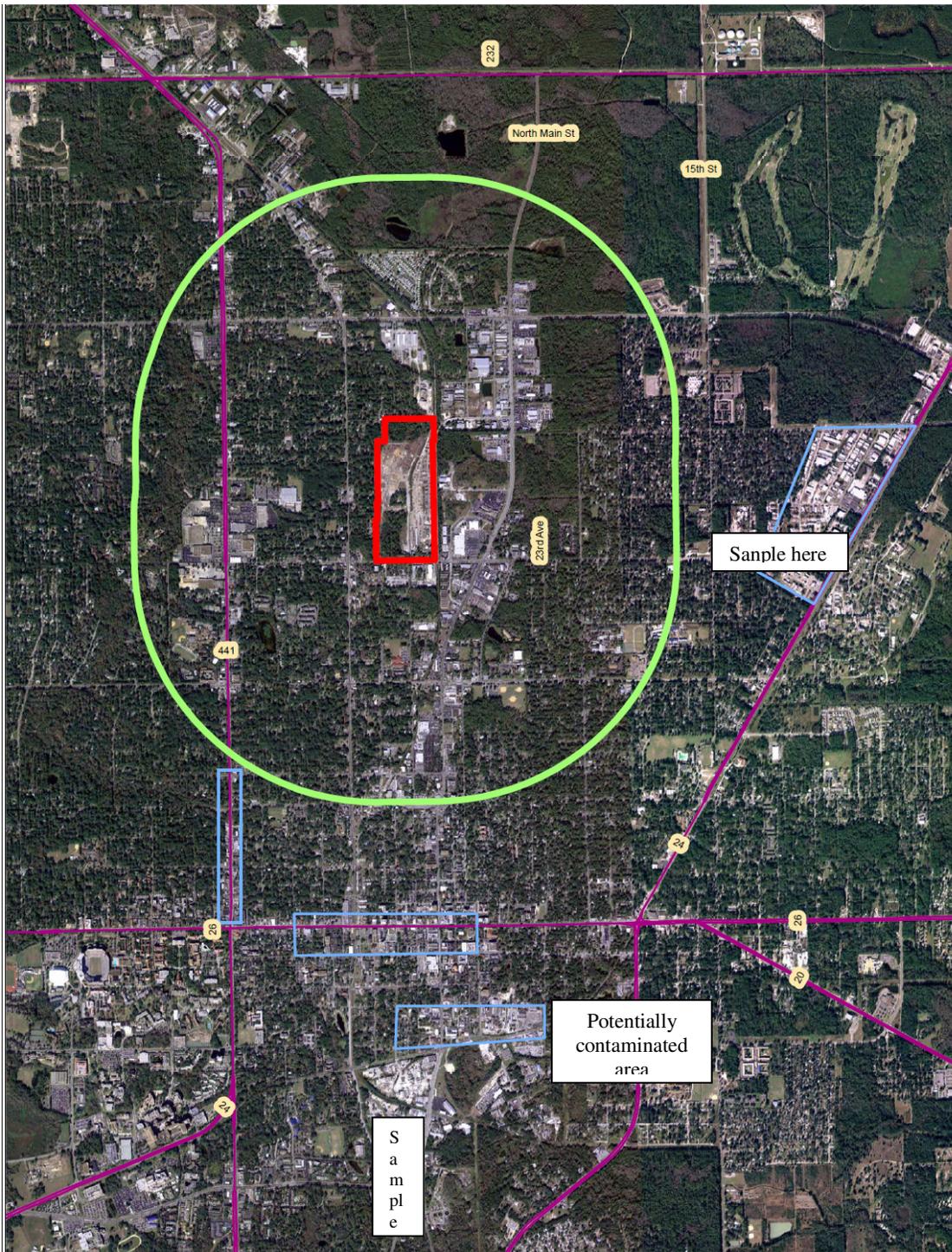


Figure 2
Proposed Background Sampling Areas

Beazer East, Inc.
 Koppers Inc. Facility
 Gainesville, Florida

LEGEND

-  Property Boundary
-  One Mile Site Radius
-  Proposed Non-Residential Background Sampling Area
-  Streets
-  Highways

Notes: Aerial imagery from GeoTrans, Inc.
 Street data from ESRI
 CAD & Data Source: GeoTrans, Inc.

AMEC Earth & Environmental, Inc.
 Westford, Massachusetts