



Charlie Crist
Governor

Ana M. Viamonte Ros, M.D., M.P.H.
Secretary of Health

Tuesday, October 28, 2008

John Mousa
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RE: Alachua County Health Departments Comments on AMEC Offsite Soil Sampling Plan for Cabot Koppers Superfund Site dated October 2, 2008 per your request.

The Alachua County Health Department, ACHD, was asked to provide comments on AMEC Offsite Soil Sampling Plan for Cabot Koppers Superfund Site dated October 2, 2008. After carefully reviewing the plan and consulting with Toxicologists from the State Health Office, the ACHD is providing the following comments listed. The context of the comments is in an effort to have the "Offsite Soil Sampling Plan" provide data that will enable the Health Department to have greater confidence in estimating the potential health threat.

1. For both background and off-site surface soil samples, The Health Department recommends Beazer's consultant collect 0-3" deep rather than 0-6" deep. It's standard procedure for FL DOH and US Agency for Toxic Substances and Disease Registry to assess the health risk based on an analysis of the top three inches. Most people are only exposed to the top three inches. In addition, dust deposition is most likely contained in the top few inches of soil. Inclusion of deeper, uncontaminated soil has the potential to underestimate surface soil concentrations.
2. Before determining off-site surface soil sample locations, The Health Department recommends Beazer use an air dispersion model to estimate the area of dust deposition. Once the area of dust deposition is better defined, they can more accurately locate surface soil sample locations.
3. Instead of paired swale soil samples, The Health Department recommends just one soil sample at each swale location. The off-site surface soil samples (in #2, above) will likely be close enough to estimate the contribution from dust deposition.

Let me know if you have any questions or if I can be of further assistance.

Anthony Dennis
Environmental Health Director
Alachua County Health Department
Florida Department of Health

Cc: Paul Myers, Assistant Director, Alachua County Health Department