

From: [Helton, Kelsey](#)
To: [John Mousa](#); robin.halbourg@alachuacounty.us
Cc: [Helton, Kelsey](#); [Webel, Connie](#); miller.scott@epamail.epa.gov
Subject: FW: Sediment removal WP- Cabot Carbon/ Koppers/ Alachua County
Date: Wednesday, September 29, 2010 12:08:20 PM

John, Robin- Referenced April 9, 2010 from NE District below.- Kelsey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Mimi Drew is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Webel, Connie
Sent: Friday, April 09, 2010 9:02 AM
To: Helton, Kelsey
Cc: Fitzsimmons, Michael; Kershner, Matthew
Subject: RE: Sediment removal WP- Cabot Carbon/ Koppers/ Alachua County

I answered your questions below in red

Connie Webel
Environmental Supervisor

From: Helton, Kelsey
Sent: Wednesday, April 07, 2010 3:47 PM
To: Helton, Kelsey; Webel, Connie
Cc: Fitzsimmons, Michael; Helton, Kelsey; Kershner, Matthew
Subject: RE: Sediment removal WP- Cabot Carbon/ Koppers/ Alachua County
Importance: High

<< File: Tar-Removal-Meeting Summary-3-2-2010-Final-doc.zip >> << File: TarRemovalWorkPlan_Full-pdf.zip >>

Connie- I meant to follow up with you on your response to my inquiry regarding DEP permit requirements- including technical/substantive requirements- that I should communicate to Cabot regarding their sediment removal Work Plan which you previously reviewed. Unfortunately I have been out of the office for a while due to a death in the family. I have attached again the WP that you previously reviewed as well as a more recent conference call summary that clarified some technical details regarding the sediment removal.

Your previous email response to me documenting the Removal WP review is highlighted below in green.

If this came into this office, I would authorize the excavation (which is proposed to be done by hand) of these "pockets" under a de minimus exemption which would also grant consent to use sovereign submerged lands. It looks from the cleanup plan that all staging areas will be in uplands so there should be no wetland impacts associated with this project therefore no mitigation required.

Let me know if you need anything else.

Connie Webel
Environmental Supervisor

I have several follow up questions:

1. While Cabot would be granted a de minimus exemption from a permit, are there substantive requirements that you would expect to be met- eg, is their technical approach outlined in the sediment removal WP and conference call summary appropriate, sound and consistent with the approach that the District would normally require, irregardless of the permit status. Is the scope/plan adequately detailed regarding the proposed sediment removal methods, sediment and pollution control, staging, stockpiling, management and disposal etc. (see attached conf call summary)

What was outlined in the call summary is typical and appropriate. The only concern is that with the change going from hand removal to a backhoe, that access from commercial properties is from uplands rather than wetland areas along the banks. Otherwise, scope of work is adequate.

2. Do you have a spill prevention and pollution prevention plan format that is normally required under such an action (if it were not exempt). Or is this something that the St JohnsWM District would require? If so, can I get a copy of the plan requirements and/or name of WMD contact person?

I do not have a standard format, it is a narrative explanation of how the applicant will prevent spill and pollution on the site specific action being proposed.

Cabot is hoping to move in early May and miss the rainy season. They have requested a conference call next Tuesday to talk about sediment cleanup goals along with the above regulatory requirements. If possible, could you and I discuss this week? I am available the remainder of this week and next Monday anytime but Friday from 9-10:30am and next Monday 10-11:30. .

I am available if needed but I do not have any additional requirements. Let me know when you want to discuss I will be available Friday afternoon and Monday morning

I appreciate your continued feedback and apologize for the last minute. This has not been a particularly good year so far!

Thank you- Kelsey Helton, HWCS, 850-245-8969

From: Kershner, Matthew
Sent: Tuesday, March 02, 2010 9:36 AM
To: Helton, Kelsey
Cc: Banks, Richard; Webel, Connie; Fitzsimmons, Michael
Subject: RE: Sediment removal WP- Cobot Carbon/ Koppers/ Alachua County

Hi Kelsey,

We are one in the same. The only difference being that Mark cold called me and I did not have a scope of work or project description to go by.

Connie is the go-to person for our program (SLERP!).

From: Helton, Kelsey
Sent: Tuesday, March 02, 2010 9:09 AM
To: Helton, Kelsey; Kershner, Matthew
Cc: Banks, Richard; Webel, Connie; Helton, Kelsey; Fitzsimmons, Michael
Subject: RE: Sediment removal WP- Cabot Carbon/ Koppers/ Alachua County

Whoops, sorry- I was addressing the email below to Matthew, not Weston. Matthew, I'll call you in a minute- We have a conference call @ 9 am today and I would like to discuss the ERP and the distinction if any between your program and Connie's office. Thanks- Kelsey

From: Helton, Kelsey
Sent: Monday, March 01, 2010 3:32 PM
To: Kershner, Matthew
Cc: Banks, Richard; Helton, Kelsey; Webel, Connie
Subject: RE: Cabot Carbon/ Koppers/ Alachua County
Importance: High

Hello, Mark- The following is a recent email from Connie Webel in the DEP District office who reviewed the Cabot sediment removal work plan. I received her email on 2/15 and was going to follow up with her this week. According to Connie, it sounded as though no permits were required. I will be commenting on the work plan and am working with the DEP- Technical Support folks (Zoe, Ligia) in Tallahassee regarding sediment cleanup goals. Let's discuss this further before it gets forwarded elsewhere.

If this came into this office, I would authorize the excavation (which is proposed to be done by hand) of these "pockets" under a de minimus exemption which would also grant consent to use sovereign submerged lands. It looks from the cleanup plan that all staging areas will be in uplands so there should be no wetland impacts associated with this project therefore no mitigation required.

Let me know if you need anything else.

Connie Webel
Environmental Supervisor

Cleanup of the Cabot Carbon/Koppers Superfund site is being conducted under "Superfund". Keep in mind that under Superfund, actions that are conducted "onsite" (defined as "where contamination is") do not require that a permit be obtained. However, while administrative components of a permitting process are not required to be completed, work plans must demonstrate that substantive (technical) permits requirements are met.

If your office or WMD would normally require an ERP permit, I'd like to discuss with you what substantive requirements must be met.

Thanks for contacting me. As project manager I'd appreciate if you would either work through me or cc me so I can keep in the loop. I have to leave office shortly but will be available tomorrow and rest of week to discuss. Thanks.

Kelsey Helton
DEP- Bureau of Waste Cleanup
Hazardous Waste Cleanup Section
Tallahassee, FL
850-245-8969

From: Kershner, Matthew
Sent: Monday, March 01, 2010 3:07 PM
To: Helton, Kelsey; Banks, Richard
Cc: 'mark.taylor@westonsolutions.com'; Webel, Connie; Maher, Jim
Subject: Cobot Carbon/ Koppers/ Alachua County

Mark Taylor/ 904-261-3085/

Weston Solutions

Cabot Corporation/

Cabot Carbon/ Koppers Superfund site

Scott Miller is EPA guy.

Mark wants to know about ERP permitting requirement for sediment removal.

ROD was approved previously.

Mark wants to know about ERP.

Mark says he can send us a plan.

Maybe Mark wants to schedule a pre-application?

Matthew Kershner
Compliance and Enforcement Manager
Submerged Lands and Environmental Resources Program
Florida Department of Environmental Protection
www.floridadep.org/water/wetlands/
(904) 807-3326