

**From:** [Helton, Kelsey](#)  
**To:** "Scott Miller"; [LLevy@gradientcorp.com](mailto:LLevy@gradientcorp.com); [Wayne Reiber](#)  
**Cc:** [John Mousa](#); [Pat Cline](#); [Kevin Koporec](#); [Helton, Kelsey](#)  
**Subject:** RE: ACEPD and City of Gainesville Comments on Soil Gas Sampling Outline - Former Cabot Carbon, Gainesville, FL - Former Cabot Carbon site , Gainesville FL  
**Date:** Friday, May 18, 2012 5:43:32 PM  
**Attachments:** [DOC051812.pdf](#)

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Scott-

Thank you for the opportunity to review and comment on the May 4, 2012 Soil Gas Sampling outline provided by Gradient for the former Cabot Carbon facility property. DEP supports the EPA and ACEPD comments below. DEP review comments from Rob Cowdery, PE, are attached.

In addition, DEP recommends that comparison of the soil gas results be based on 10-6 risk management level screening values.

We look forward to implementation of the exterior soil gas sampling as the first step in determining the need for additional investigation.

*Kelsey*

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**From:** Scott Miller [mailto:Miller.Scott@epaemail.epa.gov]

**Sent:** Friday, May 18, 2012 10:56 AM

**To:** 'LLevy@gradientcorp.com'; Wayne Reiber

**Cc:** John Mousa; Helton, Kelsey; Pat Cline; Kevin Koporec

**Subject:** Fw: ACEPD and City of Gainesville Comments on Soil Gas Sampling Outline - Former Cabot Carbon, Gainesville, FL - Former Cabot Carbon site , Gainesville FL

Good morning, Wayne and Laurent,  
I spoke with Wayne yesterday related to the draft Soil Gas Sampling Outline for the former Cabot Site submitted by Gradient on May 4, 2012. Here are EPA's draft comments on the Outline:

1. We concur with ACEPD's comment #1 and #3 below. I understand from our conversation that the analytical for the entire TO-15 compounds will be completed and that data reported.
2. Table 1 of the Outline suggests a list of compounds that would have a follow-up action

(i.e. indoor air sampling) level associated with their detection at certain concentrations. It is unclear that this list is a comprehensive set of compounds that would be associated with the previous operations at Cabot. As we discussed, the retort process is somewhat of a mystery as it relates to possible co-process materials that may have been added to the pine stumps to facilitate their conversion to end products. My prior manufacturing experience suggests to me that there were some likely additives to that process (beyond the fuel used) to facilitate the conversion process. We would respectfully suggest that Table 1 be removed from this Outline until we have an opportunity to review the data obtained from the first round of sampling in advance of determining contaminants and levels at which next steps (indoor sampling) would be required.

3. I understand from our conversation that Cabot desires to address data interpretation prior to sampling taking place. We have no issue with doing that in advance of the sampling and would be happy to facilitate those conference calls.

Thanks,

Scott Miller

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-----Forwarded by Scott Miller/R4/USEPA/US on 05/18/2012 10:30AM -----

To: Scott Miller/R4/USEPA/US@EPA

From: John Mousa <[jjm@alachuacounty.us](mailto:jjm@alachuacounty.us)>

Date: 05/07/2012 05:24PM

Cc: ""wayne.reiber@cabotcorp.com"" <[wayne.reiber@cabotcorp.com](mailto:wayne.reiber@cabotcorp.com)>, ""huttonrh@gru.com"" <[huttonrh@gru.com](mailto:huttonrh@gru.com)>, ""jherbert@geohydroconsultants.com"" <[jherbert@geohydroconsultants.com](mailto:jherbert@geohydroconsultants.com)>, ""ta@protectgainesville.org"" <[ta@protectgainesville.org](mailto:ta@protectgainesville.org)>, ""pearsonse@cityofgainesville.org"" <[pearsonse@cityofgainesville.org](mailto:pearsonse@cityofgainesville.org)>, ""kelsey.helton@dep.state.fl.us"" <[kelsey.helton@dep.state.fl.us](mailto:kelsey.helton@dep.state.fl.us)>, ""msharma@gradientcorp.com"" <[msharma@gradientcorp.com](mailto:msharma@gradientcorp.com)>, ""mark.taylor@westonsolutions.com"" <[mark.taylor@westonsolutions.com](mailto:mark.taylor@westonsolutions.com)>, ""Vanessa.Apicerno@cabotcorp.com"" <[Vanessa.Apicerno@cabotcorp.com](mailto:Vanessa.Apicerno@cabotcorp.com)>, ""LLevy@gradientcorp.com"" <[LLevy@gradientcorp.com](mailto:LLevy@gradientcorp.com)>, ""murryfj@cityofgainesville.org"" <[murryfj@cityofgainesville.org](mailto:murryfj@cityofgainesville.org)>

Subject: ACEPD and City of Gainesville Comments on Soil Gas Sampling Outline - Former Cabot Carbon, Gainesville, FL - Former Cabot Carbon site , Gainesville FL

Dear Scott,

ACEPD and the City of Gainesville have the following comments and recommendations on the draft Soil Gas Sampling Outline for the former Cabot Site submitted by Gradient on May 4, 2012.

1) As agreed in the previous subslab sampling workplan, all EPA Method T0-15 reportable compounds should be analyzed for and reported in the data results.

2) In Table 1 on Page 4 of the May 4 Draft Soil Gas Sampling Workplan, the USEPA Screening Levels shown are not consistent with those proposed earlier in the previous workplan. In the Feb 28, 2012 sub-slab sampling VI workplan, the screening levels of the carcinogenic compounds, benzene, ethylbenzene, and naphthalene were

set at the 10<sup>-6</sup> risk level. In Table 1 of the new soil gas workplan, the cancer risk level is stated as 10<sup>-5</sup> for these compounds. ACEPD and the City support maintaining the EPA Screening levels and the Proposed Exterior Soil Gas screening concentrations to be consistent with the the 10<sup>-6</sup> risk level as previously proposed. Is this a change or an error?

3) We would recommend that at least one pair of the sampling locations be placed near the middle connecting row of businesses between the Former Kmart and the Winn Dixie stores. This is to make sure that there is some data near all of the occupied businesses.

John

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