

From: [Helton, Kelsey](mailto:Helton_Kelsey)
To: wayne_reiber@cabot-corp.com; Miller.Scott@epamail.epa.gov; [John Mousa](#); [Robin Hallbourg](#); [Pearson, Stewart E.](#)
Cc: MSHARMA@gradientcorp.com; Mark.Taylor@WestonSolutions.com; Gerard_Caron@cabot-corp.com; [Helton, Kelsey](#); [Murchison, Nancy](#); [Cowdery, Robert](#); [Webel, Connie](#)
Subject: RE: DEP Review comments-Gainesville Site, Pine Tar Removal Work Plan
Date: Wednesday, December 08, 2010 3:00:57 PM

Scott- DEP has reviewed the Cabot Tar Removal Work Plan and FACT SHEET submitted on December 3, 2010. Overall, we agree with the scope and approach contained in the work plan and support the interim sediment removal proposed by Cabot.

We offer the following recommendations and comments. These comments may be addressed by revisions to the work plan or by responses to comments. Details in the work plan and supporting pollution prevent plan should be compared for consistency.

1) The work plan includes a lot of discussion on the potential public health or ecological risk that may be posed by contaminant levels in the sediments as well as the potential mobility or likelihood of reworking of sediments by natural creek processes that may bring deeper contaminants to the surface. Discussion or opinions in the work plan do not necessarily reflect EPA or DEP's interpretation of the data or the need for long term sediment remediation identified in EPA's proposed plan. As noted in DEP's previous June 9, 2010 correspondence to EPA which include the referenced University of Florida review comments and subsequent DEP October 14, 2010 proposed plan review comments, sediment contaminant levels in the creek occur at concentrations higher than sediment quality guidelines (SQAGs) and residential soil cleanup target levels (SCTLs) for PAHs and dioxin. In lieu of institutional controls limiting access and exposure frequency to creek sediments, DEP has recommended that final Superfund sediment cleanup goals be the more stringent of the SQAGs and SCTLs. We understand that the goal of this proposed interim action is the removal of tarry sediments based on visual criteria and support this interim action. We recommend that the work plan more explicitly state that this is an *interim* action and does not necessarily represent final cleanup activities to address PAH and dioxin sediment contamination in the creeks.

2) Section 3.2.2 of the work plan proposes to use visually "clean" overlying sediments from excavation areas to backfill excavated areas of the creek. This is based in part on concerns expressed by the County who has noted the significant sediment removal activities required by DOT to address sediment buildup in downstream areas of the creek and recommendations not to bring in additional fill as part of the Cabot removal. DEP's review of the data has confirmed that shallow (<6" deep) sediments are generally less contaminated and approach the SCTL for BAP--TEQ except in the locations of H-4 and SS5 where the BAP-TEQ or PAH concentrations are significantly above the SCTL and SQAGs. In those 2 areas, we request that the shallow sediment within those excavation areas be removed as well. Backfilling using visually "clean" sediments from adjacent areas *outside of the excavation footprint* is acceptable as part of this *interim* action.

3) Section 3.1.2 of the work plan refers to air monitoring to support odor control but does not provide details on the air monitoring scope. The Health and Safety Plan should include those details and be provided to the regulatory agencies prior to mobilization for the interim action. We recommend that monitoring include semi-volatiles.

4) Section 3.1.4 of the work plan refers to staging area that have yet to be determined. We understand that Cabot is discussing options with some nearby property owners. The location of the staging area and related transportation routes should be identified and communicated to regulatory agencies prior to mobilization for the interim action.

5) Section 3.2.2- Please clarify if trucks transporting sediment for disposal will be lined to ensure that residual water leakage does not occur.

6) Section 3.2.2 of the work plan indicates that a confirmatory sampling plan will be provided to EPA and DEP. We agree that those results will be useful in evaluating the need and scope for additional assessment and to support future remedial actions.

7) Section 3.2.4- Please reflect more clearly that properties used for access during the interim action will be restored to preexisting conditions to the extent possible.

8) The work plan and pollution prevention plan are not consistent with regard to how water recovered from sediment dewatering will be disposed (discharged at the Cabot lift station versus disposed at a separate disposal facility). This should be resolved prior to mobilization.

FACT SHEET:

1) Please clarify in the FACT SHEET that the Cabot removal of tarry sediments is an *interim removal action*. The goal of the interim action is to address the areas of the creeks containing more significant tarry deposits and address citizens concerns regarding potential contact with those deposits. It is not intended to address all site related contamination in the creeks nor serve as the final Superfund remedy.

2) Please reflect that EPA, DEP, ACEPD and the City reviewed and provided comments on the work plan, not just ACEPD.

3) We recommend that the fact sheet be provided to area residents as well as those along the creek to ensure that the public is aware of the upcoming removal. We also recommend that the final work plan, Health and Safety Plan and FACT SHEET be posted on the County web site where other Koppers-designated documents are posted.

We understand that Cabot hopes to mobilize in January to conduct the removal and will be contacting property owners in December to obtain the necessary site access agreements. DEP is available to discuss the comments at your earliest convenience.

Thank you.

Kelsey

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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: wayne_reiber@cabot-corp.com [wayne_reiber@cabot-corp.com]

Sent: Friday, December 03, 2010 4:04 PM

To: 'Miller.Scott@epamail.epa.gov'; jjm@alachuacounty.us; Robin Hallbourg; Pearson, Stewart E.; Helton, Kelsey

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Subject: Gainesville Site, Pine Tar Removal Work Plan

Hi Everyone,

Attached please find an Updated Pine Tar Removal Work Plan for Springstead and Hogtown Creeks.

This revised Work Plan reflects our discussions at ACEPD offices in Gainesville on November 4th and over the past year. A lot of hard work by everyone has gone into the planning of this work and I believe we have a plan everyone wants to see get done as soon as we can. We also agree we want to do this work this coming January and February 2011, a period when rainfall is expected to be low, and this presents challenges in getting remaining tasks like site access agreement behind us.

If there are no objections, we would like to begin seeking property access agreements from property owners next week. To support this, we have updated the Fact Sheet we would use to help communicate about this work. You have seen an earlier version of this and I believe Scott and John are okay with our using their names as additional contact persons. I will call you early next week to discuss the next steps. Please don't hesitate to call me before then if you would like to talk.

Regards,

Wayne

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