

From: [Miller, Scott](#)
To: [Helton, Kelsey](#); [Kestle, Rusty](#)
Cc: [Kulakowski, Zoe](#); [Gregory Council \(Greg.Council@tetrattech.com\)](#); [Brouman, Mitch \(Pittsburgh\) USA](#); [John Mousa](#); [Richard H. Hutton](#); [Cline Patricia](#); [Stewart Pearson \(pearsonse@cityofgainesville.org\)](#); [Carrie McCoy \(McCoyCE2@bv.com\)](#); [Hayes, Joshua](#)
Subject: RE: DEP review of the Koppers Pre-Design Investigation Work Plan, Design Track 2, dated May 13, 2015
Date: Friday, June 26, 2015 4:59:00 PM

Thank you, Kelsey. Friday evening seems pretty popular for the comments!

From: Helton, Kelsey [mailto:Kelsey.Helton@dep.state.fl.us]
Sent: Friday, June 26, 2015 4:40 PM
To: Miller, Scott; Kestle, Rusty
Cc: Helton, Kelsey; Kulakowski, Zoe; Gregory Council (Greg.Council@tetrattech.com); Brouman, Mitch (Pittsburgh) USA; John Mousa (JJM@alachuacounty.us); Richard H. Hutton; Cline Patricia; Stewart Pearson (pearsonse@cityofgainesville.org); Carrie McCoy (McCoyCE2@bv.com); Hayes, Joshua
Subject: DEP review of the Koppers Pre-Design Investigation Work Plan, Design Track 2, dated May 13, 2015

Scott and Rusty-

DEP has reviewed the above referenced work plan. Review comments are provided below and in the attached comments from the DEP Office of District and Business Support , DWM.

The investigation work plan proposes data collection to support design of 3 components of the selected RA for the site- 1) a subsurface cutoff wall, 2) storm water controls, and 3) sediment removal downstream of the former Koppers facility.

Subsurface cutoff wall- Adequate characterization of the extent of DNAPL is critical to location of the slurry wall in order to ensure the effectiveness of this component of the remedy in containing source material and ensuring the future stability of the plume such that GCTLs are not exceeded beyond the institutional control boundary (e.g., the Koppers property boundary). This includes the lateral extent of DNAPL in the north lagoon area as noted in the attached comments as well as east of the process area as noted in EPA's May 29, 2015 comments.

Sediment Removal downstream of the former Koppers facility- Previous onsite and offsite sediment sampling has confirmed elevated levels of dioxin and arsenic in sediments. As such, DEP requests that both analytes be included in the proposed scope of sediment sampling. Based on the results of proposed sediment sampling in the drainage ditch leading from the site to Springstead Creek, and previous results from offsite sampling in Springstead and Hogtown Creeks, it may be necessary to sample in either or both of the Creeks to determine if offsite sediments exceed cleanup criteria and/or human health and ecological criteria.

Thank you for the opportunity to comment. We look forward to completion of design and implementation of additional components of the site remedy.

Kelsey

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