



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400


Rick Scott  
Governor

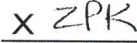
Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

## Memorandum

**TO:** Kelsey Helton, Professional Geologist  
Waste Site Cleanup Section, Waste Cleanup Program

**THROUGH:** Brian Dougherty, Administrator  
Office of District & Business Support, DWM 

**FROM:** Zoe Kulakowski, Professional Geologist  
Office of District & Business Support, DWM  10/30/2015

**SUBJECT:** Cabot Carbon/Koppers, Gainesville, Alachua County  
Work Plan for Confirmation Sediment Sampling in Springstead and  
Hogtown Creeks, dated October 16, 2015  
Site ID: WC-SF 000000007

**DATE:** October 30, 2015

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I have reviewed the subject work plan that proposes to recon known tar deposits and to sample the sediments of North Main Street Terrace Ditch, Springstead Creek and Hogtown Creek. Review comments follow.

The plan proposes that if no visual observations of tar are observed deeper than 6 inches, the 6-24 inch interval will not be sampled. Because the previous removals were performed based on visual evidence, the purpose of this sampling event is to provide chemical characterization of the sediments for the top two feet. This requires the sampling of both intervals, 0- 6 inches and 6-24 inches at every 500-foot sampling location. We want to establish the vertical extent of impacts chemically and the deeper concentration of PAHs/dioxins.

Sediment field screening should include the use of a photoionizing detector (PID) to capture ring compound volatiles, such as benzene, phenols, and ketones in addition to the proposed use of an FID.

Lab analysis must be included for dioxin/furan analysis for both vertical samples from all locations if we are to accomplish the chemical characterization goal. The department is open to Koppers paying for the dioxin/furan analysis but split sediment samples should be provided to the dioxin/furan lab.

The Figure 1 proposed sample locations needs to add at least two additional sample locations on downstream side of the "HA" observed tar deposit that was not removed in 2011 (1) to

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chemically establish the downstream extent of impacts and (2) to monitor potential erosion/migration of the last known tar deposit due to high flow events.

Figures 2 and 3 comment that the Probable Effect Concentrations (PECs) are not applicable to deep sediments. This is an accurate statement as long as high flow events do not erode the overlying clean sediment and expose the contaminated sediments to be the new sediment surface. This issue is one of the reasons for this investigation, that is, to confirm that the deep tar remains buried and poses no human or ecological unacceptable risk.

If you have any questions, please contact me at (850) 245-8982.

/zpk