RECORD OF DECISION SUMMARY OF REMEDIAL ALTERNATIVE SELECTION CABOT CARBON/KOPPERS SUPERFUND SITE GAINESVILLE, ALACHUA COUNTY, FLORIDA PREPARED BY:

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA, GEORGIA
FEBRUARY 2011

(Excerpt pp. 129-131)

11.0 Selected Remedy

11.2.3 Off-Site Remedies

11.2.3.1 Remedial Strategy for Soil. At many sampling locations investigated to date, constituent soil concentrations are below cleanup goals. At other sampling locations, one or more contaminants exceed cleanup goals and further delineation is being undertaken.

Once the areas with concentrations exceeding cleanup goals are delineated, each affected private property owner will be contacted to discuss possible approaches to address the soil impacts on the private property. The private property owner may decline to allow remediation of soils. In general, two options exist: removal or institutional and engineering controls.

11.2.3.2 [not applicable/relates to sediments]

11.2.3.3 Removal Details for Soil. If the property owner is willing, then the surface soil requiring remediation would be permanently removed. Removal is disruptive of residential lives and privacy during implementation, but it is a one-time action that permanently eliminates the potential risk associated with potential off-Site exposure to the removed soil and does not require continual long-term maintenance. Such an excavation from residential areas will require a high level of attention to detail and care to minimize spread of impacted soil and to mitigate risks associated with the presence of large trucks and heavy equipment in a residential neighborhood. In addition, stringent dust control will be implemented. The exact soil area and depth to be excavated will depend on the results of the ongoing delineation activities.

Excavated soil will be transported to the on-Site consolidation area or may be disposed of off-Site. Access between the facility property and the residential areas immediately west should be easy given the proximity.

Residential yards (and any other properties) will be restored after soil is removed. Excavated areas in residential yards will be backfilled with clean borrow soil, graded for proper surface drainage patterns, and topped with clean top soil. Lawns and small plants will be replaced, and effort will be made to preserve large trees. Transporting clean fill soil back to the residential areas and restoring the excavation zones is likely to cause additional disruption and dust generation and will result in increased risks due to the presence of large trucks and heavy equipment in a residential setting. To the extent practicable, the restoration process will progress with minimal dust generation or disruption to local residents, and will end with reseeding and final grading, as necessary.

11.2.3.4 Institutional and Engineering Controls. The components of this remedy are (1) institutional controls designed to prevent people from using or disturbing soil posing potentially unacceptable risk and (2) engineering controls to prevent receptors from potentially contacting affected soil. Institutional controls would be implemented administratively through deed restrictions and other legal processes. Engineering controls envisioned for the affected residential soil would consist of simple technologies (e.g., soil cover, fencing, and/or other simple barriers to exposure).

Engineering controls such as soil covers and fences would require ongoing maintenance. Institutional controls and engineering controls require agreement from the property owner.