

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

July 12, 2012

REPLY TO THE ATTENTION OF:
LU-9J

Via E-mail and Certified Mail 7009 1680 0000 7621 1593

Return Receipt Requested

Mike Slenska
Three Rivers Management for
Beazer East, Inc.
Manor Oak One, Suite 200
1910 Cochran Rd.
Pittsburgh, PA 15220

Re: Approval of Request for Field Work
Start Date Extension: Final Draft Work Plan
for Additional PCDD/PCDF Sampling sent
January 24, 2011
Former Koppers Company Wood-Treating
Site, Carbondale, IL
U.S. EPA ID NO. ILD 000 819 946

Dear Mr. Slenska:

Your July 12, 2012 request for an extension to begin execution of the Draft Work Plan for Additional PCDD/PCDF Sampling is approved, per the discussion below. The Work Plan for Additional PCDD/PCDF Sampling must be executed as soon as possible and no later than August 13, 2012. Please provide a 14-day advance notice of commencement of fieldwork.

During a "Live Meeting" on June 19, 2012 EPA and Beazer discussed final sampling locations (including alternatives) and access topics related to the *Final Draft Work Plan for Additional PCDD/PCDF Sampling* which was sent January 24, 2011 and which EPA had conditionally approved on June 1, 2012. The conditional approval requested some additional locations which were agreed to during the June 19 meeting. On June 22, 2012, you sent me an email with a revised sample location map which I approved via email the same day. The email also noted the following items:

- 1) when sampling in the City of Carbondale road right-of-ways, the sample location should be adjacent to the residential property boundary
- 2) as some road right-of-way areas and City-owned property are adjacent to private property, the City of Carbondale had assured Beazer that City representatives would be present during the sampling and have relevant information available to share with any residents (e.g. maps displaying city-owned property boundaries including road right-of-way boundaries)
- 3) one purpose of the June Fact Sheet was to inform residents about the sampling event in advance (mailed June 22, 2012), and
- 4) EPA must be informed when access is obtained, when obtaining access becomes problematic, and when the sampling event is scheduled.

The June 1, 2012 conditional approval stated that fieldwork must commence within 40 days of the approval letter. Noting that the access request letters were not mailed to residents until June 29, 2012, your request to extend the deadline until July 23, 2012 is reasonable because EPA feels that residents should have sufficient time to respond to an access request.

Your July 13, 2012 email stated that *"Beazer intends to wait until July 23, 2012 for receipt of all necessary property owner access. If we have not received the requisite access by that date, we would attempt to gain access for alternate locations as discussed in the June 22 e-mail and/or enlist the assistance of USEPA to gain the necessary access."* It appears that sufficient alternative locations exist within the City-owned properties. If EPA and Beazer must agree to alternative sampling locations we should schedule a discussion for no later than July 20, 2012. The Work Plan for Additional PCDD/PCDF Sampling must be executed as soon as possible and no later than August 13, 2012.

As discussed in the email I sent you today (enclosed), a property owner across the street from Sample A1-55 contacted EPA and indicated that she would grant access to her property. See the enclosed email for details.

Please call me if you have any questions at 312-886-3020.

Sincerely,



Carolyn Bury
Project Manager

Enclosure

cc: Jim Moore, IEPA
Jeff Holden, Arcadis (electronic)
Bhooma Sundar, EPA (electronic)
Tom Williams, EPA (electronic)