



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

March 14, 2014

REPLY TO THE ATTENTION OF:  
LU-9J

**Certified Mail 7001 0320 0006 0192 7132**  
**Return Receipt Requested and via Email**

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

Re: Response to Human Health Risk  
Assessment Inquiry  
Former Koppers Company Wood-  
Treating Site, Carbondale, IL  
U.S. EPA ID No. ILD 000 819 946

Dear Mr. Slenska:

Beazer recently asked EPA how to address the Northeast Carbondale neighborhood in the forthcoming Human Health Risk Assessment. Owing to the neighborhood's proximity to the Former Koppers Company Wood-Treating Site, EPA and IEPA (jointly), Beazer, and the City of Carbondale have at various times investigated the surface soil there for contamination. The evaluations proceeded due to the potential migration of site-related chemicals through surface run-off and airborne dispersion into the neighborhood.

The EPA's analysis of the soil analytical data and other evidence assembled to date indicate that the neighborhood south of the facility is not contaminated with wood-treating chemicals. The detected chemical concentrations in the neighborhood were generally in the range of urban area background concentrations. Therefore, consistent with EPA risk assessment protocol, the neighborhood south of the property does not need to be included in the risk analysis. Nonetheless, the risk assessment document should contain a description of the contaminant characterization that Beazer completed in the neighborhood, including a description of the sampling design (e.g., the rationale for sample locations) and data collection activities. The risk assessment document should include Beazer's sampling results and this letter in an appendix or attachment. In addition, the risk assessment document should make reference to the sampling results from 2005 (EPA and IEPA with Beazer's splits) and 2006 (City of Carbondale).

The following surface soil sampling events in the neighborhood supported EPA's analysis:

- 1) a soil sampling event that USEPA and IEPA completed in 2005
- 2) a soil sampling event that the City of Carbondale completed in 2006, and

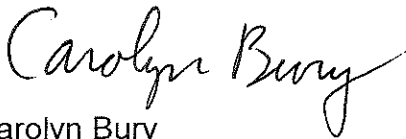
3) soil sampling events completed by Beazer East, Inc. in 2012.

EPA also considered these other available lines of evidence:

- 1) the concentrations and distribution of analytes in the soil did not indicate airborne migration under current conditions
- 2) physical barriers present in the land surface between the Site and the neighborhood would likely prevent overland flow of chemical migration from the Koppers Site to the neighborhood during precipitation events (berm and drainage ditches)
- 3) the contaminant concentrations north of the property line (on the Koppers side) were orders of magnitude higher than the concentrations found in the neighborhood to the south (supporting the conclusion that physical barriers prevent overland flow/surface migration to the south)
- 4) the detected chemical concentrations in the neighborhood were generally in the range of urban area background concentrations, and
- 5) the containment remedies and their maintenance within the facility prevent chemicals being released off-site in the future.

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

Sincerely,



Carolyn Bury  
Project Manager

cc: Jim Moore, IEPA  
Jeff Holden, Arcadis (electronic)