

From: [Robert Pearce](#)
To: [Martin, Jeff](#)
Cc: [Murry, Fredrick J.](#); [Chris Bird](#); [John Mousa](#); [Helton, Kelsey](#); pearsonse@cityofgainesville.org
Subject: Re: Interim Stormwater Management Plan for Koppers Superfund Site in Gainesville
Date: Friday, August 27, 2010 12:32:01 PM
Attachments: [Picture1.jpg](#)
[Picture2.jpg](#)

Mr. Martin,

Thank you for responding.

However, I must respectfully submit that your response does not appear to address the issues I have raised regarding Beazer's proposed plan of action; and I must strongly object to FDEP issuing a permit associated with such severe deficiencies.

Careful observation of the topographic maps and of the multiple video recordings I have submitted to FDEP clearly demonstrate these deficiencies:

1. The green-hatched area in Beazer's illustration does not even come close to accurately reflecting the actual capture area.
2. Almost all of the stormwater runoff from the heavily contaminated eastern half of the site migrates off the site to the east, and would therefore bypass the proposed containment area entirely prior to re-entering the site and then flowing into the ditch at the far northern end of the site. This includes runoff from 3 of the 4 primary source areas.
3. Runoff from the 4th primary source area (north lagoon) goes directly into the ditch without ever entering the containment/settlement area at all.

These are extraordinary deficiencies and I am astounded that FDEP would even consider issuing a permit under these conditions.

Sincerely,
Robert Pearce

On Fri, Aug 27, 2010 at 9:16 AM, Martin, Jeff

<Jeff.Martin@dep.state.fl.us> wrote:

> Mr. Pearce,

> Currently the DEP storm water application is nearly complete and by next week I expect to deem the application complete as I finish my review. The proposed plan of action for this permit involves immediately addressing the current site conditions with interim actions. The immediate interim actions are proposed to redirect flows to the onsite ditch. The permit will include an Administrative Order requiring immediate interim improvements, regular inspections and proper operational maintenance. Then on a quarterly basis, sample results of outfall discharges and a report of storm water effectiveness must be submitted. If efforts are not effective or are not showing improvement, then the interim plan must be revised to address needed changes.

>

> The future long term solution (which includes EPA plans) is a separate activity. Once the future solution is known, the applicant will need to submit a new detailed storm water design and action plan to be approved, constructed and implemented.

>

> Thank you for your information and interest in this site,

> Jeff

>

>
>
>
>
>
>
>

> The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Copy the url below to a web browser to complete the DEP survey: <http://survey.dep.state.fl.us/?refemail=Jeff.Martin@dep.state.fl.us> Thank you in advance for completing the survey.

>

> From: Robert Pearce [<mailto:robertpearce2000@gmail.com>]

> Sent: Monday, August 23, 2010 5:15 PM

> To: Martin, Jeff

> Cc: Murry, Fredrick J.; chris@alachuacounty.us; John Mousa; Helton, Kelsey; pearsonse@cityofgainesville.org

> Subject: Interim Stormwater Management Plan for Koppers Superfund Site in Gainesville

>

> Mr. Martin,

>

> Can you tell me please what stage the Beazer Stormwater Permit Application is at for the Koppers Site in Gainesville?

>

> The stormwater management diagram provided in Beazers application has been displayed in association with EPA's Proposed Plan for the Site.

>

> As the application was severely deficient in capture area and berms necessary to prevent contaminants from migrating off site via surface transport and discharge ditch, this greatly concerns me. It is even more troubling considering that Beazers "interim" plan may end up being a long-term remedy.

>

> As EPA's Proposed Plan is now in the formal "Public Comment" period, any information you can provide would be appreciated.

>

> Thank you,

> Robert Pearce

>

>