

**From:** [jdpais](mailto:jdpais)  
**To:** [HUTTONRH@gru.com](mailto:HUTTONRH@gru.com); [Chris Bird](#); [John Mousa](#)  
**Subject:** FW: comments on EPA Proposed Plan Koppers Superfund Site Gainesville, FL  
**Date:** Friday, October 15, 2010 2:27:37 PM  
**Attachments:** [image001.gif](#)  
[ISBS.PDF](#)

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Thanks for all your continuing efforts. Attached is Pat Cline's comments on unsuitability of ISBS, in case you have not seen it. David

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**From:** jdpais [mailto:jdpais@earthlink.net]  
**Sent:** Thursday, October 14, 2010 9:08 AM  
**To:** 'miller.scott@epamail.epa.gov'  
**Cc:** 'jackson.lisa@epa.gov'; 'meiburg.stan@epa.gov'; 'Keefer.David@epamail.epa.gov'; 'Osteen.Bill@epamail.epa.gov'; 'spencer.latonya@epa.gov'; 'mimi.drew@dep.state.fl'; 'oelrich.steve.s14@flsenate.gov'; 'blanco.frank.s14@flsenate.gov'; 'kirsten.stuver@myfloridahouse.gov'; 'carolyn.chatman@mail.house.gov'; 'jean.clough@mail.house.gov'; 'Ashley\_Cook@LeMieux.senate.gov'; 'celeste\_brown@billnelson.senate.gov'; 'Kelsey.Helton@dep.state.fl.us'  
**Subject:** comments on EPA Proposed Plan Koppers Superfund Site Gainesville, FL

Dear Mr. Miller,

I am resident in the adjacent Steven Foster neighborhood for over two decades, and I have been actively involved in most all of the meetings and hearings regarding the proposed cleanup of the Koppers Superfund site. I also serve on the technical advisory committee of Protect Gainesville Citizens, Inc. The recent EPA responses to my and other citizens concerns expressed in numerous correspondences and at the public hearing last August have been dismissive and disingenuous, and have failed to meet the levels of transparency, community involvement and professionalism expressed in the EPA mission statement and directives. **I ask you to correct these deficiencies and provide a revised plan that the citizens can endorse.**

The proposed plan fails to adequately protect human health and safety and to provide a comprehensive and permanent solution to the contamination on the site. The plan is seriously deficient and inadequate in addressing migration of contaminants and the proposed HG ISBS treatment remedy is unreliable and has does not have a proven record under FL hydro-geological conditions. Furthermore, the proposed plan may violate state and local ordinances protective of groundwater and prohibitive of stockpiling hazardous waste within the city well field area. In short, ***the proposed consolidation and onsite***

***stockpiling of contaminants is unacceptable to this community.***

Additionally, I, along with local residents feel that the **FL residential clean up target levels (SCTLs) are applicable, relevant and appropriate requirements mandated by CERCLA; both on and off site.**

I urge you to re-evaluate options in the feasibility study to include: a reassessment of excavation or thermal extraction of all source areas, removal of all off site soils that fail to meet state SCTL and leachability standards; an expedited comprehensive offsite delineation and clean up of residential properties, and a significantly enhanced storm water management plan. These essential elements, along those additional elements detailed in the City of Gainesville/ Alachua County recommendations must be included in a revised plan and record of decision.

The citizens of this community have waited over 25 years for an effective and permanent cleanup of this site. We demand and deserve the best and most comprehensive treatment remedies available.

Respectfully,

*David Pais*

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Sen. Steve Oelrich (Florida Senate, District 14)

Rep. Charles Chestnut IV (Florida House of Rep., District 23)

Rep. Corrine Brown (Florida House of Rep., District 3)

Rep. Cliff Stearns (U.S. House of Rep.)

Sen. George LeMieux (U.S. Senate)

Sen. Bill Nelson (U.S. Senate)