

From: Miller.Scott@epamail.epa.gov
To: John.Mousa
Cc: Anthony.Dennis@doh.state.fl.us; Robin.Hallbourg
Subject: Re: Air Monitoring Issue and Particulate Matter Assumptions -- Proposed Approach to Estimating Potential On-site Human Health Risks Associated with Soils and Sediments at the Koppers Inc. Wood Treating Facility in Gainesville, Florida" dated June 23, 2008
Date: Thursday, June 26, 2008 3:39:46 PM

John,
Thank you for preliminary comments on the "Proposed Approach to Estimating Potential On-site Human Health Risks Associated with Soils and Sediments at the Koppers Incorporated Wood Treating Facility in Gainesville, Florida". We look forward to further discussion with ACEPD on this proposed approach.

We anticipate that a preliminary modeling of potential off-site risks to residents from inhalation and contact with potentially contaminated dust from the Site will be part of a complete risk assessment for the Site. The June 23, 2008, evaluation contains such a risk assessment component for workers on-site as well as trespassers and construction workers. It appears to us on a first reading of the June 23, 2008, document that such an evaluation for workers onsite may produce useful information to address the potential offsite risks to residents as a first-cut towards ultimately addressing concerns off-site.

As we have previously discussed, Beazer has agreed to undertake off-site soil sampling and analysis. We believe that a compilation of the current off-site soil conditions along with a complete risk assessment including off-site soil risks to residents will go a long way to addressing the potential offsite risks to residents from inhalation and contact with potentially contaminated dust from the Site.

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06/24/2008 04:57 PM
To
Scott Miller/R4/USEPA/US@EPA
cc
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Subject
Air Monitoring Issue and
Particulate Matter Assumptions --
Proposed Approach to Estimating
Potential On-site Human Health
Risks Associated with Soils and
Sediments at the Koppers Inc. Wood
Treating Facility in Gainesville,
Florida" dated June 23, 2008

Scott,

ACEPD would like to bring two issues related to offsite risks to airborne contaminants from the Koppers site to your attention.

- 1) One issue relates to the request that ACEPD has received from our County Commission as a result of neighboring residents complaining about dust from the Koppers site. The County Commission has asked ACEPD to evaluate the issue of ambient air sampling for particulates and chemicals of interest from the Koppers site (specifically arsenic, PAHs and dioxins) with respect to determining if there is an impact to residents in the adjoining neighborhoods. Preliminary estimates for performing a minimal air study that has sufficient duration and looks at all the

parameters of interest have indicated that this is an expensive proposition for local government. In further evaluation of this issue, we have had discussion with the State of Florida Health Department who have suggested that a preliminary modeling of potential offsite risks to residents from inhalation and contact with potentially contaminated dust from the site might be a good first step to determine whether there is any further need to even consider air sampling. ACEPD would like to know if USEPA or Beazer is planning on conducting any modeling of current offsite exposure to airborne contaminants from the Koppers site during the update of the risk assessment that is being proposed by Beazer currently. Preliminary review of the just received " Proposed Approach to Estimating Potential On-site Human Health Risks Associated with Soils and Sediments at the Koppers Inc. Wood Treating Facility in Gainesville, Florida" dated June 23, 2008 shows that offsite airborne risks to residents is not included in the approach. It would seem that since the on-site concentrations of contaminants have a direct impact on concentrations in the air and worker exposure is being considered that the offsite airborne risk should be evaluated at the same time. ACEPD believes that this needs to be seriously considered at a minimum or else air sampling needs to be performed by Beazer or USEPA.

2) The second related issue involves an ACEPD preliminary comment on a factor being used in the assessment of Respirable Particulate Matter (RPM) in section 3.5.2.8 of the above report. The report indicates it is using an average of 0.019 mg/m³ for the default RPM for Alachua County from one station sampling station that operated for less than one year in Newberry, Florida. ACEPD believes that this value is too low a value to use for PM₁₀. Being familiar with the sampling station, ACEPD knows that the data cited from the FDEP website is in fact PM_{2.5} data and not PM-10 data which is what the report indicates it is using. Actual PM₁₀ data from earlier data from Alachua County from stations that are no longer operating indicates that the PM₁₀ annual average is more in neighborhood of) .030 to 0.040 mg/m³ from two urban sites in the City of Gainesville. (For instance, check the following USEPA websites which report data from the early 1990's to 2001 from sampling stations operated by GRU and FDEP in Gainesville---

<http://www.epa.gov/airtrends/pm.html>

[http://www.epa.gov/cgi-bin/broker?
_service=data&_server=shire.epa.gov&_port=4071&_sessionid=/NBn5BHg140&_PROGRAM=dataprog.siteplot_07.sas&_debug=0&site=120010023&poll=](http://www.epa.gov/cgi-bin/broker?_service=data&_server=shire.epa.gov&_port=4071&_sessionid=/NBn5BHg140&_PROGRAM=dataprog.siteplot_07.sas&_debug=0&site=120010023&poll=)

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The Newberry site is a rural site in a park setting with no industrial activities nearby. On the contrary, the Koppers site has been observed to be extremely dusty at times and the actual levels if they are ever measured near the site would probably be significantly higher than the default 0.019 value used in the report. ACEPD strongly recommends that a more realistic value be employed for this factor.

I would appreciate getting a response from USEPA about the issue of ambient air sampling in number 1 above and will be prepared to discuss item 2 at the June 30, 2008 meeting.

Thanks

John Mousa