



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

2011 DEC -5 PM 4:28

NOV 29 2011

The Honorable Craig Lowe, Mayor
City of Gainesville
200 East University Avenue, Station 19
Post Office Box 490
Gainesville, Florida 32602-0490

Dear Mayor Lowe:

Thank you for your November 8, 2011, letter addressed to Lisa P. Jackson, Administrator of the U.S. Environmental Protection Agency, concerning the Cabot Carbon/Koppers Site. Your letter has been forwarded to the EPA Region 4 office in Atlanta, Georgia, for response.

The Agency is in receipt of the July 22, 2011, Indoor Dust Dioxin Workgroup Plan (the Workplan). We are working with members of the City of Gainesville and its technical contractors, as well as the Alachua County Environmental Protection Department (ACEPD) staff in Gainesville in selecting and obtaining access to individual properties in which to implement the Workplan recommendations. Dr. Patricia Cline, the Protect Gainesville Citizens technical advisor, is coordinating the selection of individual properties for study. Further discussions related to this topic will continue on the Region's monthly Koppers Site status call.

It is important to note that in a June 2011 health study of the Stephen Foster neighborhood by the Florida Department of Health, incidence of cancer did not show increased rates for any of 18 cancers during any of the five year periods encompassing 1981-2000, and that some cancers were shown to have occurred at less than expected rates in these time periods. In addition, the Centers for Disease Control, in a November 17, 2010, letter to Alachua County Commissioner Cynthia Chestnut Moore, indicated that, "Adverse outcomes associated with dioxin exposures have not been reported in populations exposed to dioxin at the levels seen to date in the community surrounding the Cabot/Koppers property." EPA will take care in designing and implementing the Workplan study in such a way as to ensure that the results are scientifically-defensible and provide valid data to be used for future decisionmaking related to possible remedial actions. The fourth, and expected final, phase of offsite soil delineation identifying the probable footprint of required remediation will be conducted during the week of December 12, 2011. The topic of possible permanent relocation of residents was addressed in the 2011 Record of Decision. The factors addressed at that time have not changed. A portion of this discussion is included below:

"EPA is guided in its possible consideration of relocation as a remedy by an EPA guidance document entitled, "Interim Policy on the Use of Permanent Relocations as Part of Superfund Remedial Actions" published on June 30, 1999. A summary of that guidance related to the decision to consider permanent relocation in the feasibility study process is included below:

EPA's preference is to address the risks posed by the contamination by using well-designed methods of cleanup which allow people to remain safely in their homes and businesses. Having proven EPA's ability to

successfully restore contaminated property at many Superfund sites, generally, EPA's preference is to address the risks posed by the contamination by using well-designed methods of cleanup which allow people to remain safely in their homes and businesses. This is consistent with the mandates of CERCLA identified above, and the implementing requirements of the NCP which emphasize selecting remedies that protect human health and the environment, maintain protection over time, and minimize untreated waste. Because of CERCLA's preference for cleanup, it will generally not be necessary to routinely consider permanent relocation as a potential remedy component.

There are four situations in which EPA may consider permanent relocations as part of the feasibility study development process. The current situation nearby the former Koppers Site meets none of the criteria listed. The four criteria are as follows:

- 1) Situations where EPA has determined that structures must be destroyed because they physically block or otherwise interfere with a cleanup and methods for lifting or moving the structures safely, or conducting cleanup around the structures are not implementable from an engineering perspective.
- 2) Situations where EPA has determined that structures cannot be decontaminated to levels that are protective of human health for their intended use, thus the decontamination alternative may not be implementable.
- 3) Permanent relocation may be considered when EPA determines that potential treatment or other response options would require the imposition of unreasonable use restrictions to maintain protectiveness (e.g., typical activities, such as children playing in their yards, would have to be prohibited or severely limited).
- 4) Permanent relocation may be considered when an alternative under evaluation includes a temporary relocation expected to last longer than one year.

EPA and PRPs have routinely conducted cleanups in the State of Florida and throughout the United States that are contemplated in the preferred remedial alternative. The remedy is simple from an engineering perspective in that it involves removing up to two feet of top soil from an affected property and replacing it with clean fill, reseeding the yard, and reinstalling any landscaping that had to be removed from the yard to remove the soil. It is unlikely that structures nearby the former Koppers Site are contaminated. After the soil cleanup, there will be no use restrictions required for the yard as there will be clean fill in the yard which would pose no threat or require a use restriction. It is expected that the yard cleanups would take significantly less than one year based on the number of parcels believed to be affected and the simple implementation approach needed to complete the soil remediation.

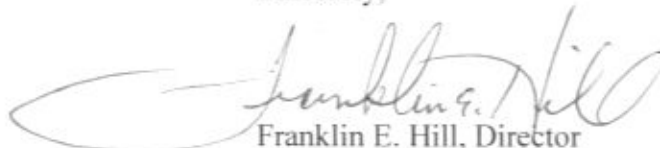
Residents surrounding the Site are not located on a direct source area or a highly contaminated groundwater plume. Based on concentrations of contaminants in surface soil at surrounding residences and the practical remedial alternatives that exist for preventing exposure to these soils, relocation is not warranted.”

Temporary relocation options will be provided to residents while offsite soil remediation takes place as we discussed with you and City of Gainesville staff at our September 21, 2011, meeting with members of the Protect Gainesville Citizens.

Beazer East continues to implement portions of the selected remedy while negotiating the Consent Decree with EPA. A dedicated Floridan recovery well is scheduled to be installed in the December 2011-January 2012 timeframe. There is no current need to install additional dedicated Floridan recovery wells at this time. Should future conditions change, additional wells may be required to be installed. Groundwater sampling and analysis continues on a quarterly basis for wells installed in the Floridan aquifer.

We appreciate your desire to protect and preserve the environment and hope you find this information helpful. If I may be of further assistance, please contact me or have a member of your staff contact Scott Miller at (404) 562-9120.

Sincerely,



Franklin E. Hill, Director
Superfund Division

cc: ccom
CMGR