

October 14, 2010

Mr. E. Randall Merchant
Environmental Administrator
Florida Department of Health
4052 Bald Cypress Way
Tallahassee, FL 32399

Dear Mr. Merchant:

Alachua County's Environmental Protection Advisory Committee (EPAC) is comprised of 11 citizens who provide advice to our County Commissioners on protection of the natural resources and public health of our community. For the past several years, EPAC has been deeply involved in activities relating to the Koppers Superfund site, including public education that may have played a role in Koppers' decision to shut down its wood-treating operations late last year. That decision of course was critical because it made site remediation much more feasible.

We greatly appreciate the contributions that the Department of Health (DOH) is making toward the Koppers clean-up, including your September 24, 2010 letter urging EPA to require a number of actions in its Record of Decision, including measurements of dust in nearby homes, schools, and businesses.

I am writing now to urge you and your colleagues to expedite the study of whether there are cancer "hot-spots" in Gainesville and if so whether these "hot-spots" might be linked to the exposure of Gainesville residents to pollution emitted by Koppers over recent decades. Both the Alachua County Commission and the Gainesville City Commission have repeatedly called for such a study by the DOH. I know that you and others in DOH have been present at Commission meetings and other events where residents have expressed their concerns and fears that there is a possible cancer cluster in the neighborhoods surrounding Koppers. Whatever the results of a cancer study of the area might show, providing these citizens with some answers – and providing them promptly – is clearly the proper course of action.

DOH personnel have told me that they intend to conduct such a study. They have even told me how much work would be involved in producing such a study – somewhere between one and two man-months. No hiring of outside contractors would be necessary; the study could be done in-house. So why has there been such a long delay in getting the study underway?

I have been told that the lack of complete sampling, presumably data from soil samples in neighborhoods near Koppers, has stalled the study. This argument is not convincing. Surely, any cancer study, in the interests of statistical significance, would look at a geographical area far larger than the area where soil sampling is currently taking place. Therefore, why not delineate this larger area now, along with a corresponding control area elsewhere in Gainesville, and get the study process started? To my knowledge, neither of these steps has been taken, for reasons that are not clear.

EPAC strongly urges the DOH to initiate the Gainesville cancer study as soon as possible. I know that these are constrained budgetary times for all State agencies. But your Department already has the relevant data in hand. The resources required to analyze them properly seem small in comparison with the anxiety and ongoing health concerns of those who have lived near this polluting site for many years. Our citizens need your support on this vital issue.

Thank you for your attention to this matter.

Respectfully yours,

Bob Palmer
Chairman
Alachua County Environmental Protection Advisory Committee