

October 15, 2010

Mr. Scott Miller, Project Manager
US EPA REGION 4
61 Forsyth Street, S.W.
Atlanta, GA 30303-8960
Email: miller.scott@epamail.epa.gov

RE: Cabot-Koppers Superfund Remedial Plan, dated July 15, 2010

Dear Mr. Miller:

In their response to EPA's remedial plan for the Koppers site, both the Gainesville City Commission and the Alachua County Commission have recommended that:

“ ... USEPA identify and facilitate the mobilization of resources to address adverse health effects of individuals via a door-to-door health study in the neighborhood affected by the Koppers Superfund site contaminants, including but not limited to dioxins. To the extent that adverse health impacts are found to result from the Koppers offsite contamination, the USEPA is requested to enforce financial responsibility requirements on Beazer East.”

The Alachua County Environmental Protection Advisory Committee (EPAC) is comprised of 11 citizens appointed by the County Commission to provide advice on protection of natural resources and public health in our community. EPAC strongly supports the joint Commissions' recommendation for a comprehensive health survey (CHS) and is pleased to inform you that a group of Gainesville health professionals has come together to implement such a survey.

Producing a rigorous and defensible CHS is not a simple matter, and in fact some past surveys have been neither scientifically valid nor useful from a public health perspective. But with careful planning and execution, such surveys can be extremely valuable, both in providing concerned residents with critical health information and local health professionals with additional diagnostic and clinical tools. Keys to a successful CHS include a well-designed questionnaire, trained interviewers, careful selection of subjects, and statistically valid analysis.

The Gainesville health professionals interested in conducting the CHS – faculty and graduate students in the University of Florida's College of Public Health and staff from the Suwannee River Area Health Education Center – recognize the pitfalls that have befallen other surveys and are committed to doing the Gainesville survey right. Once Institutional Review Board approval for the CHS has been obtained, I anticipate that representatives from the Florida Department of Health would also actively participate in this study. Discussions are already underway among these partners (along with City and County officials), and preparation of a comprehensive survey questionnaire is nearly complete.

I know that you and your colleagues at EPA have been present at local Commission meetings and other events where residents have expressed their concerns and fears about the incidence of cancers and other health problems in the neighborhoods surrounding the Koppers site. Whatever the results of

a CHS of the area might show, providing these citizens with answers is clearly the right thing to do. The cost of a CMH would be very small compared to the cost of the cleanup itself, and EPAC would strongly urge EPA to include a Beazer-funded CHS, to be conducted by the Gainesville professional health team described above, as part of its Record of Decision on the Koppers site.

Should you have any questions regarding the Community Health Survey, please feel free to contact me (352-371-4093 – rpa711@yahoo.com) or Ky Gress of the University of Florida (352-374-0848 – kygress@ufl.edu).

Thank you for your consideration of this request.

Sincerely,

Bob Palmer, Chairman
Alachua County Environmental Protection Advisory Committee