

## MEMORANDUM

TO: Alachua County Commissioners

FROM: Bob Palmer, Chairman  
Environmental Protection Advisory Committee (EPAC)

SUBJ: Update on Koppers Health-Related Issues

DATE: February 28, 2011

### Summary

The recently released Record of Decision (ROD) on the Koppers Superfund site has considerable detail on contaminants at the site and its prospective cleanup, but no information on potential health effects to citizens from exposure to the site over a period of decades. There are two ongoing efforts to assess these health effects, as will be discussed in this memo.

### The Cancer Incidence Study

As you know from the testimony of local citizens at Commission hearings, there are many anecdotal accounts of elevated cancer rates in Stephen Foster and surrounding neighborhoods. The Florida Department of Health (DOH) has conducted a number of cancer incidence studies over the years to investigate claims of elevated cancer levels. For example, last year, a DOH study documented a “pediatric brain cancer cluster” in the Acreage area of Palm Beach County.

DOH typically conducts cancer incidence studies with in-house personnel. They involve analysis of data from the State’s cancer registry, which has recorded most but not all instances of Florida patients diagnosed with cancer since the 1980s. These studies require care in selecting potentially affected communities and “control” communities, and in eliminating confounding variables (e.g. smoking, age, gender). Despite these difficulties, it is troubling that no cancer incidence study was conducted for the first 25 years after Koppers was declared a Superfund site.

In response to pressure from local citizens and both local Commissions, DOH initiated a cancer incidence study late last year. I have written to the DOH personnel in Tallahassee conducting the study to inquire about methodology, but have received no reply. Local DOH representative Anthony Dennis has said that results of the study are expected in March, 2011.

Obviously, a cancer incidence study is not a remedy to anything, but it would give residents, local officials, and local medical personnel a much better idea of the risks posed by Koppers.

### Comprehensive Health Effects Study (CHES)

On October 14, 2010, the Chair of the Alachua County Commission wrote to Thomas Freiden, Director of the Centers for Disease Control (CDC), with the following request:

“[We] have received requests from concerned citizens ... for a door-to-door comprehensive health study to ascertain potential exposure and adverse health impacts that may be associated with contaminants from the Site. The requested comprehensive health study is beyond the current capabilities of local and state health officials. We are requesting that CDC consider making resources available to conduct and manage a health study ...”

At the same time, EPAC sent a letter to EPA recommending that EPA require Beazer to fund a CHES as part of the Record of Decision.

Neither of these requests received a favorable response. EPA did not require Beazer to fund a CHES and Freiden responded to the Commission on November 17 that “a door-to-door health study based on possible dioxin exposures is not recommended”.

It should be noted that a CHES may involve far more than a door-to-door survey, including detailed survey design, interviews by trained health personnel, cross-checking with medical records, blood samples (e.g. dioxin levels), and other elements. These studies are expensive and are very difficult to get right. They require a team effort involving epidemiologists, toxicologists, statisticians, and other health professionals. The Commission was quite right in stating in its October 14 letter that conducting a valid CHES was beyond the capability of local and State officials.

But it would not be beyond the capability of the University of Florida, if the requisite skill-set could be assembled from the relevant Schools of Medicine, Public Health, IFAS, and Liberal Arts. To that end, I began working with City Commissioner Lauren Poe and Assistant City Manager Fred Murry late last year to gauge interest at UF in assembling a team to conduct a CHES. We have had two meetings with UF personnel, the first in January and the second just two weeks ago. Michael Perri, the Dean of the School of Public Health, and approximately five other UF professors are now investigating whether they can pull together a proposal that would be comprehensive, useful to the community, and of sufficient scientific interest to attract Federal funding. Other local and regional entities involved in these meetings could also play a role, including the Department of Health and the Suwannee River Area Health Education Center. The City and County employees who represent our interests in Washington have also been involved in the discussions. The process is ongoing, and its success is by no means assured. But as Commissioner Poe indicated during the February 17 City Commission hearing, a solid proposal from UF is the last best hope for our community to get its much needed Koppers health survey.