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Governor

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Scott Miller
Remedial Project Manager
Superfund Division
Superfund Remedial Branch, Section C
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: EPA's Cabot/Koppers Proposed Plan

Dear Mr. Miller:

Thank you for the chance to comment on EPA's July 2010 proposed plan for the Cabot Carbon/Koppers Superfund site in Gainesville, Florida.

On-Site Soil

In a June 2010 letter, the Florida Department of Health (DOH) concluded that transport of contaminated dust from the Koppers site to the nearby Stephen Foster neighborhood is a public health concern [DOH 2010a]. The responsible party proposes to root rake and disk 26 acres of hardened lime rock on the site. Some of this area is within 100 feet of the Stephen Foster neighborhood. Root raking and disking have the potential to create contaminated dust that can drift into the nearby neighborhood. This potential continues until the establishment of a vegetative cover.

In the Cabot Carbon/Koppers plan, EPA should require the responsible party to water the site to suppress dust formation prior to root raking and disking. While they root rake and disk, EPA should require the responsible party to continue to water daily or as necessary for dust suppression. After completion of root raking and disking, EPA should require a daily soil moisture check and water as necessary to prevent dust formation until a vegetative cover is fully established. After a vegetative cover is fully established, EPA should require a weekly check of soil moisture and water as necessary until implementation of a permanent remedy.

In the Cabot Carbon/Koppers plan, EPA should also require the responsible party to assess the health risk for future use of the Koppers hazardous waste site including commercial and residential.

Off-Site Soil

In a 2009 report, Florida DOH and the Agency for Toxic Substances and Disease Registry (ATSDR) concluded that incidental ingestion (swallowing) for more than a year of very small

amounts of surface soil from the City of Gainesville easement adjacent to the western Koppers boundary between NW 26th and NW 30th Avenues could possibly harm children's health [ATSDR 2009]. In June 2010, the Florida DOH found the temporary fence and warning signs were not effective in preventing trespass on this easement. Florida DOH recommended the City of Gainesville or responsible party replace the temporary fence and signs with a more effective barrier to trespass [DOH 2010b]. In the Cabot Carbon/Koppers plan, EPA should require the City of Gainesville or the responsible party to post warning signs and erect an effective barrier to trespass until soil in this easement is remediated.

In two reports, Florida DOH and ATSDR concluded that surface soil testing in the Stephen Foster neighborhood adjacent to the Koppers site had not extended far enough and recommended additional testing [ATSDR 2009, 2010a]. In the Cabot Carbon/Koppers plan, EPA should continue to require the responsible party to test surface soil until they define the extent of contamination.

Florida DOH supports the plan to remove off-site surface soil exceeding Florida's soil cleanup target levels and replace it with clean fill.

Off-Site Indoor Dust

In the Cabot Carbon/Koppers plan, EPA should require the responsible party to investigate site-related contaminants in the dust of nearby homes, schools, and businesses. The 2009 AMEC Earth & Environmental, Inc. report is inadequate to assess this issue since it only addresses on-site dust deposition under current conditions and does not address past off-site dust deposition [AMEC 2009]. In the Cabot Carbon/Koppers plan, EPA should also require the responsible party to remediate nearby buildings found to have dust with site-related contaminants at levels that pose an unacceptable risk to health.

Off-Site Creek Sediments

In a 2010 draft report, Florida DOH and ATSDR concluded that although incidental ingestion (swallowing) of very small amounts of contaminated sediments in the Springstead and Hogtown Creeks is not likely to harm people's health, contaminant concentrations are still above state standards and should be cleaned up [ATSDR 2010b]. In the Cabot Carbon/Koppers plan, EPA should require the responsible parties to cleanup contaminated sediments in Springstead and Hogtown Creeks.

References

[AMEC 2009] AMEC Earth & Environmental. Potential Fugitive Dust Impacts Predicted from Air Dispersion Modeling. Koppers, Inc. Wood-Treating Facility. Gainesville, Florida. Westford, Massachusetts. August 17, 2009.

[ATSDR 2009] Agency for Toxic Substances and Disease Registry. Health Consultation. Off-Site Surface Soil, Koppers Hazardous Waste Site, Gainesville, Alachua County, Florida. U.S. Department of Health and Human Services. Atlanta, GA 30333. July 17, 2009.

[ATSDR 2010a] Agency for Toxic Substances and Disease Registry. Health Consultation. Additional Off-Site Surface Soil, Koppers Hazardous Waste Site, Gainesville, Alachua County, Florida. U.S. Department of Health and Human Services. Atlanta, GA 30333. June 17, 2010.

[ATSDR 2010b] Agency for Toxic Substances and Disease Registry. Health Consultation. Public Comment Version. Springstead and Hogtown Creek Sediments, Cabot Carbon-Koppers Hazardous Waste Site, Gainesville, Alachua County, Florida. U.S. Department of Health and Human Services. Atlanta, GA 30333. June 23, 2010.

[DOH 2010a] Letter from E. Randall Merchant, Florida Department of Health to Anthony Dennis, Alachua County Health Department. June 15, 2010.

[DOH 2010b] Electronic mail from Randy Merchant, Florida Department of Health to Anthony Dennis, Alachua County Health Department. July 1, 2010.

Thanks again for a chance to comment on EPA's proposed plan for the Cabot Carbon/Koppers site.

Sincerely,

A handwritten signature in black ink that reads "Randy Merchant". The signature is written in a cursive, flowing style.

E. Randall Merchant
Environmental Administrator
850 245-4299

cc: Anthony Dennis – Alachua CHD
Kelsey Helton – Florida DEP
John Mousa – Alachua CEPD