



Alachua County Environmental Protection Department

Chris Bird, Director

July 31, 2007

Mr. Scott Miller
Remedial Project Manager
US EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: Follow-up on July 6, 2007 Letter Regarding Soil Contamination from Koppers Superfund Site

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) appreciates your quick response via our phone conversation of July 27, 2007 concerning the issues identified in our letter of July 6, 2007. In our July 6 letter, ACEPD expressed concern about the levels of the dioxin and benzo-a-pyrene reported in the boundary soils at the Koppers site. ACEPD requested expedited action by USEPA to confirm these concentrations and requested off-site soil sampling in the residential and commercial areas adjoining the site and in the off-site discharge areas for the onsite ditch in order to evaluate the potential for human health and environmental risks to these adjoining areas.

In our phone conversation, you indicated that USEPA had presented ACEPD's concerns and recommendations to representatives of Beazer East, Inc. (Beazer), the responsible party for site clean-up. You indicated that Beazer had questions about the quality of data provided by their laboratory for the dioxin analysis and that they had already decided to reanalyze the soil samples collected in December 2006 for dioxin using a different laboratory. This new data is supposedly to be available in next few weeks. You also indicated that Beazer was not willing at this time to commit to doing any offsite soil sampling. You did indicate that off-site sampling would need to be performed at some time. To follow up from our phone conversation in which you expressed USEPA's interest in providing assistance to address local concerns about the potential impacts from the Koppers site, ACEPD has the following further observations and makes the following further recommendations:

1. Data obtained by re-extraction and re-analysis of soil samples collected in December 2006 as proposed by Beazer may not provide defensible and accurate data. In particular, the holding times for the soil samples previously collected is only 40 days according to EPA SW-846 and CLP guidelines. ACEPD believes the only way to get accurate, defensible confirmatory data on the on-site samples is to perform a re-sampling and re-testing within appropriate holding times. Additionally, this sampling and analysis should be performed by a separate contractor working for USEPA and the samples should be analyzed by an approved EPA lab with full laboratory data validation. Even though the holding time issue may make the reanalysis data from Beazer less



reliable, nevertheless, ACEPD would still highly recommend that this reanalysis data be subjected to rigorous QA/QC review by the EPA Athens laboratory.

2. ACEPD again emphasizes the need to immediately assess the impacts on offsite properties of any contamination from the Koppers site in order to evaluate any potential for human health concern for nearby residents. The evaluation of biota and human health impacts from any elevated levels of dioxin or benzo-a-pyrene in the ditches and Springstead creek which received discharges from the on-site ditch is also required. ACEPD recommends that USEPA, in addition to reconfirming the on-site data using a contractor working for USEPA as recommended in item 1 above, should also, at the same time, have this independent contractor sample and test soils from residential and commercial properties to the west, north and east of Koppers site for the full suite of chemicals of site concern including dioxin and benzo-a-pyrene.

ACEPD appreciates USEPA and your prompt attention to these concerns. Please call me at (352) 264-6805 if you have any questions or would like to discuss these comments further.

Sincerely,



John J. Mousa Ph.D.
Pollution Prevention Manager

CC: Chris Bird, ACEPD
Kelsey Helton, FDEP
Robin Hallbourg, ACEPD
Gus Olmos, ACEPD
Paul Myers, Alachua County Health Department
Mark Garland, City of Gainesville