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August 7, 2008

Mr. Scott Miller  
Remedial Project Manager  
Waste Management Division  
U.S. EPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303

Re: Preliminary Comments from City of Gainesville and Alachua County Environmental Protection on Koppers Site Soils Risk Assessment Approach

Dear Mr. Miller:

This letter transmits preliminary comments developed jointly by the City of Gainesville (City) and Alachua County Environmental Protection Department (ACEPD) in response to the Koppers Soils Risk Assessment Approach proposed by AMEC for Beazer East, Inc. in the June 23, 2008 report and further explained at the June 30, 2008 meeting at the Florida Department of Environmental Protection (FDEP) in Tallahassee, Florida. The City and ACEPD are currently jointly preparing additional detailed comments to address several technical issues and concerns about the proposed soil risk assessment approach. These detailed comments will be communicated in a follow-up correspondence and will further consider protectiveness for current or future uses.

The City is concerned that the proposed risk assessment approach for Koppers site will not be adequate to make remedial action decisions that are protective for current or future uses of the site. The proposed risk assessment only emphasizes protection for current onsite workers and occasional trespassers on the site. We are concerned that

- All pathways and potential receptors are not addressed, particularly considering high levels of contamination near residential neighborhoods and the potential for contamination discharges offsite from the Koppers ditch (drainageway), and
- Potential future uses of the Koppers site are not adequately considered.

As has been previously communicated to USEPA, the Gainesville City Commission has adopted a resolution on June 23, 2008, requesting the USEPA require the responsible parties to clean-up the soils and groundwaters at the Koppers site to residential clean-up standards. This resolution continues to be supported by the City/County and GRU. One purpose of this resolution is to achieve the best level of protection for neighboring residential properties adjacent to the Koppers site. More discussions between USEPA and the City may need to occur to clarify the implications of residential standards and future land use issues associated with this site.

Alternatives evaluated in the planned Feasibility Study (FS) for onsite soils must be protective of both human health and the environment. All relevant pathways must be considered. The following issues need to be addressed and may alter the remedy selection to meet the threshold criteria of protection, as required by EPA.

#### **1. Migration to groundwater**

High concentration areas will need to be remediated to address both direct contact (surface soil) as well as deeper contamination of greater concern for ongoing migration to groundwater. It is expected that this will be addressed in the Feasibility Study and integrated with the decisions for surface soil.

#### **2. Migration to Adjacent Properties**

A high priority for the site is to reduce potential impacts to nearby residents. Contamination such as with dioxin at the western fence line is frequently more than ten times the Default FDEP clean-up criteria that are protective for residential properties, and because of the close proximity it is likely that elevated concentrations are present offsite. Remediating hot spots in the site interior to protect workers does not address ongoing releases (runoff and dust) for more sensitive receptors at the site perimeter, a primary concern of the community. We believe more stringent criteria based on residential exposure assumptions should be developed for the site and potential ongoing releases identified as a priority for the final remedy.

#### **3. Surface Soil and Sediment Transport via Stormwater**

The proposed approach for onsite sediments in the drainage way is based on the assumption of very limited exposures for onsite workers or trespassers. That is not the primary concern for this exposure route. These contaminated sediments are a source of offsite contamination with concentrations (e.g. with dioxin, benzo-a-pyrene ) orders of magnitude above relevant screening values (ecological and/or human health) at the point of discharge from this drainageway. Both the residual upstream contaminated sediments, as well as any ongoing releases from nearby soils, must be evaluated for this migration pathway and decisions regarding onsite remedial actions for sediment and soil must consider protection of offsite receptors from these ongoing releases.

#### **4. Other Onsite Receptors**

Homeless persons should be considered as potential on-site receptors since they are known to frequent the site, and their exposures would be much higher than the estimates used for trespassers.

Potential risks to ecological receptors should also be considered when selecting a final remedy for onsite soil and sediments where concentrations above ecological screening values are present in the more natural wooded areas that may attract wildlife.

#### **5. Need to Evaluate Soil in Northwestern Wooded Area**

No data have been collected in the Northwestern Wooded area. Based on site history, it is likely that soils in this area may be contaminated. This should be further evaluated for current and future risks.

#### **6. Consideration of Off-Site Sampling Results**

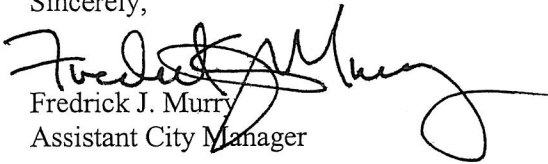
It is understood that some offsite sampling will be performed followed by submission of a sampling report in January of 2009, however, it appears that the Draft FS will be submitted in December of 2008, prior to the completion of the offsite sampling. The offsite sampling results may influence the estimates of the site as an ongoing source to offsite receptors. Therefore, the FS for onsite soil cannot be finalized until off-site soil data has been evaluated and this transport pathway has been fully evaluated.

## 7. Need for Updated Conceptual Model

Currently, the site is being evaluated as a series of isolated topics without consideration of how these would integrate in selecting the final remedy. Therefore, an updated conceptual site model should be developed, and the approach/schedule for the integrated onsite soil assessment be documented before alternatives are evaluated in the FS to support a final remedy for onsite surface soil and sediment.

If you have any comments or questions about these comments, please contact me, at (352) 334-0510.

Sincerely,



Fredrick J. Murry  
Assistant City Manager

CC: Russ Blackburn, City Manager  
Pat Cline  
Kelsey Helton, FDEP  
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John Mousa, ACEPD ✓  
Marion Radson, City Attorney