



Alachua County Environmental Protection Department

Chris Bird, *Director*

May 28, 2010

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

Re: Concern about Possible Buried Drums on Koppers Superfund Site

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) and the City of Gainesville have received communications from residents near the Koppers Superfund Site concerning the possibility that drums of toxic materials are buried on the Koppers site. ACEPD and the City have not verified this information for reliability, however, we are concerned that there may be some validity to these citizen concerns considering the long production history and the historical waste disposal practices at the site. Based on the Final Feasibility Study (FS), there is the potential that some areas of the Koppers site could be covered in the final remedy. We are concerned that any drums of toxic materials if present could be buried if no prior investigation is done to locate and remove them. It does not appear from the FS that any type of survey to locate possible buried drums is planned in the remedial phase of the project. Also, it does not appear that any previous investigation for buried drums was completed in the Remedial Investigation phase. Therefore, we believe it is essential to further investigate this potential principal threat waste during the remedial design phase. If drums are identified, we encourage USEPA to use its authority to move forward with assessment and/or removal actions to address this threat. A removal action would be appropriate, particularly given the proximity to the City's wellfield.

We propose that appropriate language be included in an amended Feasibility Study, the Proposed Plan and the Record of Decision for the site to address this issue. The following language is an example.

"During the design phase, and before any soil remedy is implemented a magnetometer or other surface geophysical survey and any needed confirmatory drilling and sampling will be completed to identify the potential presence of buried drums. If identified, USEPA will initiate the process to implement a removal action to address the buried drums, to expedite addressing the hot spots and facilitate moving forward with the implementation of the overall site remedy."

We appreciate your support on this critical issue. If you have any questions, please don't hesitate to contact me.

Sincerely,

John J. Mousa, PhD
Pollution Prevention Manager

Cc: Chris Bird, Director ACEPD
Rick Hutton, GRU
Kelsey Helton, FDEP
Dr. Pat Cline
Robin Hallbourg, ACEPD

Fred Murry, Asst. City Manager Gainesville
Stewart Pearson, City of Gainesville
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