



Alachua County

Board of County Commissioners

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March 8, 2011

Ms. Gwendolyn Keyes-Fleming
Regional Administrator, USEPA Region 4
61 Forsyth Street, S.W.
Mail Code: 9T25
Atlanta, GA 30303-8960

Dear Regional Administrator Fleming:

On behalf of the Alachua County Commission, I am writing in response to the recently released USEPA Region 4 Record of Decision (ROD) final cleanup plan for the Cabot/Koppers Superfund Site located in Gainesville, Florida.

The ROD addresses some of the County's concerns on the USEPA Proposed Plan expressed to USEPA in our joint comments with the City of Gainesville dated October 8, 2010, including USEPA's commitment to require Beazer East, the responsible party, to utilize the more protective Florida soil clean-up criteria for off-site contaminated properties.

However, USEPA's decision to allow Beazer East to create an on-site, permanent mounded area for land disposal of both on-site and off-site contaminated soils (aka "Soil Consolidation Area") certainly contradicts USEPA's own mission statement. The remedies selected to mitigate this site are in stark contrast to the very first bullet point of the mission statement listed on your website that "all Americans are protected from significant risks to human health and the environment where they live, learn and work".

Every day the people in the City of Gainesville and in Alachua County who drive by this site will be reminded of the contamination harbored there and the potential of what might result from having the contaminated material stored on the site. This on-site remedy will reduce the future redevelopment potential of the property. What would-be developer in their right mind would be willing to put substantial dollars into an area known for its dioxin contamination? Also, the ROD's soil excavation remedy for off-site neighborhood properties will be delayed if contingent upon construction of the Soil Consolidation Area.

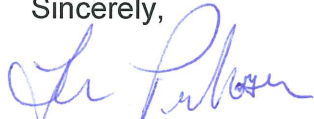
In addition, the County requests USEPA's urgent attention to several critical remaining tasks and aspects of the ROD:

For the mental well-being of the people potentially affected by the Koppers site,

1. Complete the off-site contaminated soil delineation in residential and commercial areas as soon as possible;
2. Complete the excavation and restoration of contaminated soils on affected off-site properties as soon as possible;
3. Expedite the verification of community concerns regarding neighborhood indoor dust contamination and health effects;
4. If health risks associated with indoor dust contamination from this Superfund site are verified, take prompt federal actions, including but not limited to amending the ROD to require decontamination and permanent relocation;
5. Complete the Consent Decree to allow ROD implementation as soon as possible.
6. Provide community access to future documents and plans associated with ROD implementation including periodic updates on cleanup progress.

Please follow your own mission statement and protect the citizen's health and well being. Please develop and implement an effective final remedy for this Superfund site. Our community remains highly concerned about the timeline for resolution of off-site contamination and health concerns and urges USEPA's critical attention to these issues.

Sincerely,



Lee Pinkoson, Chair
Alachua County Commission

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LP/CB/cb

cc: Board of County Commissioners
Randall H. Reid, County Manager
Dave Wagner, County Attorney
Scott Miller, Remedial Project Manager, Region 4
Lisa P. Jackson, Administrator, USEPA
Senator Bill Nelson
Senator Marco Rubio
Congressman Cliff Stearns
Congresswoman Corrine Brown
Mayor Craig Lowe, City of Gainesville
Russ Blackburn, City Manager, Gainesville
Fred Murry, Asst. City Manager, Gainesville
Marion Radson, City Atty
Chris Bird, Alachua County Environmental Protection Director