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**Subject:** Preliminary ACEPD Comments on Arcadis Beazer Offsite Data Summary and Fingerprinting Evaluation dated April 6, 2011-- Request for Additional Review Time  
**Date:** Thursday, April 14, 2011 5:14:00 PM

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Scott,

ACEPD is requesting sufficient time to review and fully analyze the conclusions and recommendations of the Arcadis Offsite Data Summary and Fingerprinting Analysis report dated April 6, 2011. We would like to request that we have until May 20 to get final comments to you. This is due to the fact that I will be on vacation for two weeks near the end of April and early May and I would like to work with the City of Gainesville and ACEPD staff to put together final comments to you. I would appreciate your accommodation of this request.

Based on a quick review however, ACEPD has the following preliminary concerns and issues with the recommended additional sampling and data analysis so far. These may change with further analysis.

- 1) Arcadis and Beazer seem to be giving priority in the workplan to getting additional samples to support the determination of a background associated with a busy street such as 6<sup>th</sup> street and just finishing up some data gaps immediately west of the Koppers site. However, ACEPD believes that an equally important target of any further offsite sampling should be to complete the delineation of ALL potential offsite impacts with dioxin from the site in order to be able to establish trends in the contamination. We believe it is important that sufficient testing be done to fully delineate the contamination and assess the general impact to the Stephen Foster Neighborhood so that the extent of area needing remediation can be expeditiously established and also provide sufficient data to assure the residents that the entire neighborhood is safe. While it may be possible to establish that there is a higher expected background of dioxin along a busy street like NW 6<sup>th</sup> Street, this busy street background would not be applicable to residential areas west of 6<sup>th</sup> Street. There does exist background residential data for dioxin from neighborhoods several miles away from the site taken in 2009 that indicate a very low residential background level below the FDEP SCTL. To this extent until there is agreement that an alternate residential background has been established and met or the FDEP SCTL (7ppt) is achieved, ACEPD believes it is necessary to continue sampling across NW 6<sup>th</sup> Street to the west to make sure that the level of contamination past NW 6<sup>th</sup> Street does in fact drop to the FDEP SCTL for residential or to the agreed to residential background level. It is equally important the entire 6<sup>th</sup> Street corridor west of the site be sampled. It is important that the delineation of dioxins not stop just because there is a proposed busy street background has been met at NW 6<sup>th</sup> Street immediately west of the site.
- 2) ACEPD believes that there needs to be additional limited sampling performed along rights of way or on properties to the north and northwest of the site, past where the FDEP SCTL is

achieve along NW 33 Ave. We believe this is necessary to definitively conclude that there are not site impacts with dioxin north of the line where the FDEP SCTL is met. While not the main reason for doing this additional sampling, there is data that shows a higher level concentration of dioxin on the City property north of the site which is adjacent to the NW 33rd Ave locations where the 7 ppt is met. This fact may indicate that there could be higher contamination north of where the current delineation has stopped.

- 3) ACEPD has reservations about whether an applicable supportable "background" for the NW 6<sup>th</sup> Street corridor can be legitimately established considering the different conditions that exist in terms of land use when comparing the streets proposed by Arcadis Beazer for the additional background samples.

In general we think that the delineation will be incomplete and not adequate if the testing is stopped without taking more samples along NW 6<sup>th</sup> Street, West of NW 6<sup>th</sup> Street and North of NW 33rd Ave in addition to proposed locations South of the site. In addition without looking further at the justification provided by Arcadis, additional sampling to the east and northeast may also be needed. These should be planned in this next round of sampling along with any data needed to try to get a better estimate of possible background values. Once all this data is obtained then there can be discussions about the applicability of background data, the meeting of SCTLs and the interpretation of the results.

We will have additional comments concerning the locations of additional background sampling, the identification and the fingerprinting analysis once we have had time to analyze the data further in terms of Arcadis conclusions about alternate sources of contamination.

Call me to discuss on Friday 4-14-11 if you want.

Thanks

John Mousa