



Alachua County Board of County Commissioners

Mike Byerly, Chair
Cynthia Moore Chestnut, *Vice Chair*
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Administration
Randall H. Reid
County Manager

May 19, 2009

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

Dear Mr. Miller:

The Alachua County Board of County Commissioners (Board) wishes to express our strong concern about the recently released offsite soil sampling data from the area near the western boundary of the Koppers portion of the Cabot-Koppers Superfund site and in the adjoining residential neighborhood. This data indicated levels of dioxins, benzo-a-pyrene and arsenic at levels significantly above the State of Florida FDEP residential soil clean-up target concentrations in several of the offsite soil samples. These elevated levels of contaminants have significantly increased the level of concern about potential long term health effects and impacts to property values from residents living in the adjoining neighborhood. The Board is extremely disappointed with the fact that this offsite soil assessment was only recently completed considering the on-going, over 25 year history of investigation activities at this Superfund site. The Board urges USEPA to take expeditious actions to complete the delineation of the extent of the contamination in the neighborhood and to immediately implement interim actions to minimize the exposure of residents to this offsite contamination. The Alachua County Environmental Protection Department on May 18, 2009 communicated to USEPA several concerns and recommendations for interim actions by USEPA (see Attachment A). The Board fully supports these recommendations. In addition the Board urges the USEPA to investigate the extent of offsite contamination in the commercial and residential areas to the east and south of the Koppers facility as well.

Sincerely,

Mike Byerly, Chair
Alachua County Commission
chr09.095

MB/JJM

cc: Board of County Commissioners
Randall H. Reid, County Manager
Dave Wagner, County Attorney
Pegeen Hanarhan, Mayor, City of Gainesville
Gainesville City Commission
Carol M. Browner, Assistant to the President for Energy and Climate Change
Lisa Jackson, Administrator, USEPA
A. Stanley Meiburg, Acting Regional Administrator, USEPA Region 4
Senator Bill Nelson
Senator Mel Martinez
Congresswoman Corrine Brown
Congressman Cliff Stearns
Marion Turner, MWW

Attachment A: Alachua County Environmental Protection Department Requested Actions and Concerns on Recent Offsite Soil Data Near the Koppers Superfund Site

Attachment A.

Alachua County Environmental Protection Department Requested Actions and Concerns on Recent Offsite Soil Data Near the Koppers Superfund Site

The Alachua County Environmental Protection Department (ACEPD) has serious concerns raised by the recent sampling data indicating that concentrations of dioxins, benzo-a-pyrene, and arsenic exceed the FDEP Residential SCTL criteria in soils in the City of Gainesville easement west of the Koppers facility western boundary and also in samples taken 100 ft further west in the neighborhood adjoining the Koppers Superfund Site. ACEPD understands that USEPA plans and will require additional sampling and delineation of the contamination measured in the offsite soils. However, ACEPD is requesting in addition to and associated with this sampling that USEPA take the following actions:

- 1) USEPA should implement immediate actions to limit exposure to or remediate soils with the higher levels of dioxin above FDEP Residential SCTLs in the near vicinity of the Koppers boundary fence and the City of Gainesville easement. These actions may involve soil removal, fencing, signage or other actions to limit access and exposure to the neighborhood residents.
- 2) USEPA should include samples from the 0 to 3 inch depth as well as samples from the 0 to 6 inch depth when additional testing is performed for dioxins, benzo-a-pyrene and arsenic. ACEPD makes this request because we believe that exposure to residents will be greater in the top 3 inches of soil and this practice is consistent with the procedure followed by the Alachua County Health Department when testing for contaminants in soil. In addition, the on-site Koppers soil data for dioxins from the December 2006 sampling shows on average that in the 10 locations sampled nearest the western boundary of Koppers, the average concentration in the top 3 inches (524 ppt) was more than 2 times the average concentration in the top 6 inches (258 ppt). (Sample locations SS1, SS2, SS3, SS5, SS6, SS7, SS-20, SS-22, SS-24, SS-26). ACEPD also believes that the measurement from the top 3 inches will be more representative of the deposition from dust from the Koppers site than the deeper depth soil.
- 3) The default FDEP residential SCTLs for dioxins, benzo-a-pyrene and arsenic should be used as remedial goals for the offsite soils.
- 4) USEPA should include addressing the offsite contamination within the Record of Decision expected for the Koppers site this year. ACEPD would like to strongly emphasize the need to not allow the new demands for dealing with the offsite residential soil contaminant issues to delay completion and execution of the remedial plan for onsite soil and groundwater contamination. ACEPD believes that these issues should be handled simultaneously and independently in terms of time frames while still being coordinated for overall project planning and completion purposes.