

From: Miller.Scott@epamail.epa.gov
To: [Hutton, Richard H](mailto:Hutton.Richard.H)
Cc: Denman.Bill@epamail.epa.gov; [Mike Byerly](mailto:Mike.Byerly); "Cheryl Krauth"; [Chris Bird](mailto:Chris.Bird); [Donovan, John F. - Commissioner](mailto:Donovan.John.F.-Commissioner); "Joe Prager"; [Lowe, Craig](mailto:Lowe.Craig); robertpearce2000@gmail.com; Koporec.Kevin@epamail.epa.gov; Osteen.Bill@epamail.epa.gov; [Murry, Fredrick J.](mailto:Murry.Fredrick.J); [John Mousa](mailto:John.Mousa); [Robin Hallbourg](mailto:Robin.Hallbourg); [Helton, Kelsey](mailto:Helton.Kelsey); [Brouman, Mitch](mailto:Brouman.Mitch) (Pittsburgh) NA; [Council, Greg](mailto:Council.Greg)
Subject: RE: What Lies Beneath - Are There Barrels Buried at the Koppers Superfund Site? Plus What Historical Aerials Reveal...
Date: Monday, June 07, 2010 11:17:33 AM

Greetings, All,

We are in the process of evaluating the possibility of buried drums of waste at the Koppers Gainesville Site which will take place as part of the remedial design effort.

As part of developing a workplan to address these possible buried drums, we are conducting a Koppers Site walk where we will review available information and determine where if buried drums may exist. As part of that effort, we are inviting interested community members to take part in this Site walk. This will be an informal event with no presentations, etc. but simply a fact-finding approach. We will conduct this meeting starting at 7 p.m. not to exceed 2 hours on Tuesday, June 15, at the Koppers Site office building. Please RSVP so that we may know in advance what size participation we can expect and plan accordingly.

We will meet folks at the Koppers front gate (NW 23rd Avenue entrance) from 6:30-7 p.m. to lead folks back to the office building. We would appreciate it if folks submit their summary findings in written form upon arrival so that we may use them as a guide for the tour.

Thank you,
Scott Miller
Remedial Project Manager
Superfund Division
Superfund Remedial Branch
Section C
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
Phone (404) 562-9120
Fax (404) 562-8896

From: "Hutton, Richard H"
<HUTTONRH@gru.com>

To: 'Joe Prager' <jprager@cox.net>, 'Cheryl Krauth'
<cheryl@protectgainesville.org>

Cc: Scott Miller/R4/USEPA/US@EPA, "byerly@alachuacounty.us" <byerly@alachuacounty.us>, "Lowe, Craig" <lowesc@cityofgainesville.org>, "Donovan, John F. - Commissioner" <donovanjf@cityofgainesville.org>, "Helton@dep.state.fl.us" <Helton@dep.state.fl.us>, Bill Denman/R4/USEPA/US@EPA, "chris@alachuacounty.us" <chris@alachuacounty.us>, "robertpearce2000@gmail.com"

<robertpearce2000@gmail.com>

Date: 06/01/2010 10:20 AM

Subject: RE: What Lies Beneath - Are There Barrels Buried at the Koppers Superfund Site? Plus What Historical Aerials Reveal...

Joe – Thank you very much for bringing this information forward.

Rick Hutton, P.E.
Supervising Utility Engineer
Strategic Planning
Gainesville Regional Utilities
(352) 393-1218

From: Joe Prager [<mailto:jprager@cox.net>]
Sent: Thursday, May 27, 2010 4:46 PM
To: 'Cheryl Krauth'
Cc: miller.scott@epa.gov; byerly@alachuacounty.us; Lowe, Craig; Donovan, John F. - Commissioner; Helton@dep.state.fl.us; denman.bill@epa.gov; chris@alachuacounty.us; robertpearce2000@gmail.com; Hutton, Richard H; 'Joe Prager'
Subject: What Lies Beneath - Are There Barrels Buried at the Koppers Superfund Site? Plus What Historical Aerials Reveal...

It's hard to imagine that after 26 years there could be anything new about the Koppers Superfund site in Gainesville. Unfortunately, this is not the case.

Recently, we've begun investigating multiple accounts of buried barrels (drums) at the Koppers Superfund site here in Gainesville. Our research included interviewing eyewitnesses, who stated that they saw drums or barrels being buried on the Koppers site in the past. In addition, we spent 4 days downloading and reviewing historical aerial photos of the Koppers site, which reveal large areas of disturbed soil in the Northern Inactive Area. This new information raises a lot of questions and concerns.

In a recent interview with a local resident, who has lived next door to Koppers since the 1950s, we heard an eyewitness account of how dozens of barrels (55 gallon drums) were buried by workers in protective suits and hoods on a holiday weekend in the summer of 1969. This family, who lives immediately adjacent to the western boundary of the Koppers site, witnessed this activity firsthand, and described how a backhoe dug a deep trench, and how workers in protective suits rolled dozens of 55 gallon drums off a flatbed truck into the freshly dug trench. The trench was then covered over and the soil compacted by the backhoe to cover up this activity that same afternoon.

One witness we interviewed has pinpointed the location of the buried barrels as being immediately west of the existing blue concrete block building with a sheet metal roof located in the middle of the site, directly adjacent to the Northern Lagoon. The location described to us where the drums were buried is near where soil sample SS031 and SS025

appear in Figure 1-9 of the new EPA Feasibility Study dated 5-11-2010 (Figure 1-9 appears on page 331 of 414 of the report – see attached PDF file). Also, please note that this soil sample is only 6 inches deep, not 6 feet, so it could not have detected the contaminants if they are still present, at that depth.) The interviewee's account speaks volumes about the need for detailed ground penetrating radar (GPR) testing of the site, starting at that location, and including other areas of the site. Worse, it is not the only such account of buried drums that we are aware of.

Regrettably, local and Federal environmental officials have previously disregarded such eyewitness accounts, and have yet to demand GPR testing of the Koppers site. While at first these stories about Koppers' employees burying drums might sound anecdotal, it is in fact not uncommon for buried drums to be found on Superfund sites during cleanup operations. More to the point, other information we have found indicates that Koppers apparently has a track record for burying barrels of contaminants at other sites. Here are some examples we discovered:

1. An article from a Pittsburgh paper, dating back to March, 1973, (4 years after the alleged dumping incident at the Gainesville Koppers site), that describes dumping of barrels at a site in Pennsylvania:
<http://news.google.com/newspapers?nid=1144&dat=19730318&id=61wcAAAAIBAJ&sjid=81MEAAAAIBAJ&pg=4186.927497>

2. A 2006 newspaper article, by the Pittsburgh Post Gazette, detailing additional problems with Koppers and buried drums, dating to 1979:

<http://www.post-gazette.com/pg/06240/716869-28.stm>

And, that's not all. The historical aerials we reviewed, covering the time frame from 1961 – 1974, show other possible problem areas. Starting with the 1961 aerial, we noticed a football field-sized disturbed area in the far northwest corner of the site, in the Northern Inactive Area. Moving forward in history, the 1965 aerial shows yet another smaller disturbed area adjacent to that same spot. Then in the 1968 aerial, we see a series of six (6) long, deep parallel trenches in the area immediately south of the Northern Inactive Area. While it's not possible to be 100% certain about the purpose of these trenches, it appears that the 6 deep trenches, which can be seen in the aerials from 1968, 1971 and 1974, (see attached), were likely used to treat creosote logs. Understand that back then creosote wood was manufactured by filling a ditch or pond or other enclosed area with creosote, then soaking the pole(s) overnight – not by use of any vacuum cylinder equipment.

We shared these same aerials with an industry expert - a former treated wood plant supervisor, who worked for years at a treated wood plant in South Carolina- and he was convinced that these 6 parallel trenches could have been used to make creosote poles, six-at-a-time. If used in that manner, it would have actually been quite efficient. In the later aerials from 1971 and 1974, there are even finished poles visible stacked up on the east side of these trenches and untreated poles stacked on the west side of these trenches (see 1971 and 1974 aerials attached). If there are other possibilities, then Koppers, Beazer East or the EPA need provide an explanation for this activity, since these trenches were open and used for something from at least 1968 until 1974.

Some time afterwards, the trenches were closed up.

It's also interesting that, even though remedial investigations have gone on at this site for 26 years, there do not appear to be any studies done of the aerial photos of the Koppers site. At least, the EPA's Feasibility Study, which describes in detail the work done on the site, fails to mention that this work ever occurred.

Of equal concern, these same aerials, particularly those from 1968, 1971 and 1974, show large disturbed areas in the middle of the so-called Northern Inactive Area. The aerials show areas where it appears that the soil has been heavily disturbed and possibly moved by heavy equipment. In a best case scenario, these could be only piles of sawdust, but the possibility that these photos instead show evidence that Koppers buried trash, debris or contaminants from their ongoing operations in the woods, should not be overlooked. Even today, there is a huge sawdust pile remaining in that area, and a "treated wood graveyard" in the center of the Northern Inactive Area, where large piles of old creosote and treated wood poles have been discarded and are now overgrown with vines.

It's important to note that two of highest readings of soil contaminants come from the Northern Inactive Area. One sample in particular from that area, (SS-104AA), shows a reading for dioxins (TECC-TEQ) that is 24,377 times higher than the Florida residential SCTL for dioxins – yet this "dioxin hot spot" is a mere 95 yards from the backyards of other residents on the adjacent street.

In conclusion, while it may be difficult now, some 40 odd years later, to determine what transpired on this site, and "what lies beneath" at the Koppers site, it is certainly clear that the EPA and FDEP have more work to do in this area. Additional sampling using ground penetrating radar (GPR) to determine what contaminants or debris may have been disposed of or buried on this site, seems essential to the cleanup effort. Since several of the aerials from the 70's show 6 deep parallel trenches that were likely used as creosote treatment ditches, further testing also needs to be done in this specific area to determine if there is contamination present- to determine if this is a "5th Lagoon".

Finally, evidence of large areas of disturbed soil in the so-called Northern Inactive Area point to the need for further investigation there as well. If this activity turns out to be benign piles of sawdust, then further testing will reveal that, but if these areas were used as dumping grounds, it may be no coincidence that some of the highest readings of contaminants came from soil samples taken in 2009 in that Northern Inactive Area.

What is certain is that if there are additional buried contaminants found, what lies beneath Koppers must be addressed as part of any remedial plan - now rather than later. Otherwise, these point sources could continue to pose an ongoing threat to our water supply and the health of our local residents for years to come.

Joe Prager, Publisher
BANCCA.ORG, LLC
Email: inbox@bancca.org

