



Alachua County Board of County Commissioners

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County Manager

October 5, 2010

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

Re: Alachua County Comments and Recommendations on USEPA Superfund Proposed Plan Cabot-Koppers Superfund Site, Gainesville, Alachua County, Florida, dated July, 2010

Dear Mr. Miller:

This letter transmits the Alachua County Board of County Commissioners (BoCC) Comments and Recommendations on the USEPA Superfund Proposed Plan for the Cabot-Koppers Superfund Site (Koppers Site) dated July, 2010. Alachua County's recommendations were developed by a local, intergovernmental team consisting of staff from the Alachua County Environmental Protection Department, the City of Gainesville, Gainesville Regional Utilities (GRU), and the Alachua County Health Department and their highly qualified technical consultants. These recommendations reflect the input and concerns of the technical team, our local citizens, the BoCC, and the Gainesville City Commission.

Alachua County recognizes the recent efforts of USEPA to develop a clean-up remedy for the Koppers Site that meets the challenging environmental issues present at the site. The County previously submitted extensive comments and concerns to USEPA on the Draft Feasibility Study for the Koppers Site, and appreciates USEPA's willingness to address some of our concerns in the Final Feasibility Study and the Proposed Plan. However, the current Proposed Plan falls short of meeting Alachua County's expectations. It needs to be significantly stronger to be acceptable to our local community.

In particular, the County requests that excavation and offsite disposal of source areas be implemented at this Site. We believe this remedial approach would provide the highest degree of confidence from the

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community and the highest level of permanence for the site remediation. The Koppers Site has been an environmental concern to our community for over 25 years, and recently detected soil contamination in the adjacent neighborhood has raised a number of health and property value concerns for nearby residents. We believe it is critical that any clean-up plan for the Koppers Site needs to be rigorous and complete enough to protect our groundwater resources and the City of Gainesville's Murphree Wellfield from toxic contamination, remove and reduce the volume of contaminated waste in our community, protect the long term health and property values of nearby residents, and be compatible with the future reuse of this property. We ask that USEPA implement the recommendations and address the issues highlighted in the attached comments and recommendations in the Record of Decision for this Koppers Site.

Alachua County appreciates USEPA's efforts to restore this community's confidence in achieving a timely and conclusive remedy for this Superfund site. If you have any questions about the attached comments and recommendations, you may contact Dr. John Mousa at the Alachua County Environmental Protection Department at 352-264-6805.

Sincerely,

A handwritten signature in dark ink, appearing to read "Cynthia Moore Chestnut". The signature is fluid and cursive, with the first name "Cynthia" being the most prominent.

Cynthia Moore Chestnut, Chair
Alachua County Commission
chr10.148

CMC/JJM/jjm

Attachment: City of Gainesville and Alachua County Comments and Recommendations on USEPA Superfund Proposed Plan Cabot-Koppers Superfund Site, Gainesville, Alachua County, Florida (July, 2010) dated October, 2010

cc: Board of County Commissioners
Randall H. Reid, County Manager
Dave Wagner, County Attorney
Chris Bird, County Environmental Protection Director
Craig Lowe, Mayor, City of Gainesville
Gainesville City Commissioners
Russ Blackburn, Gainesville City Manager
Marion Radson, Gainesville City Attorney
Bob Hunzinger, General Manager, GRU
Kelsey Helton, FDEP
Senator Bill Nelson
Congressman Cliff Stearns
Congresswoman Corrine Brown

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