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Subject: Proposed Indoor Dioxin Dust Sampling Implementation Plan and Actions
Date: Friday, December 02, 2011 5:21:00 PM
Attachments: [Indoor Dust Study - Letter to Near Site Homeowners Final Draft \(12-1-11\).docx](#)
[Indoor Dust Study - Letter to Background Homeowners Final Draft \(12-1-11\).docx](#)
[Koppers - Dust Plan FAQs-2 \(12-11\) JJm Rev v4 with FDOH and CDC revs.docx](#)
[Revised Access Authorization and Survey Questions on the Back 12-1-2011.docx](#)
[e911_addresses_and_Mailing_Combined_SF_\(NW32AV-NW26AV\)\(11-29-2011\).xlsx](#)
[e911_addresses_and_Mailing_Combined_BK1\(NW45-42AVE\)_11-29-2011.xlsx](#)
[e911_addresses_and_Mailing_Combined_BK2\(WUniv-SW_6PL\)_11-29-2011.xlsx](#)
[SF_Neighborhood_Parcel.jpg](#)
[Background_Neighborhood_1_Parcel.jpg](#)
[Background_Neighborhood_2_Parcel.jpg](#)
[Koppers - Dust plan implementation steps \(12-1-11\).docx](#)

Scott,

ACEPD has been working as part of a local task force to assist Dr. Pat Cline develop a plan for selection of homes for implementation of the July 2011 FDOH Indoor Dioxin Dust Workplan by USEPA. You had previously asked Dr. Cline to assist you in locating homes for the dust study. The local task force consists of individuals who were involved in the developing the FDOH workplan with the addition of a statistics expert from the University of Florida. This group will be referred to here as the Task Force Subgroup (TFSG). The TFSG includes, Dr. Cline, Dr. Bob Palmer (chair of the County's Environmental Protection Advisory Committee), Anthony Dennis (ACHD), Chris Bird (ACEPD), Fred Murry (City of Gainesville), myself and Dr. Mary Christman, a statistics professor with the University of Florida. The steps in the proposed implementation plan developed by the TFSG are summarized in the attached documentation.

In accordance with attached Implementation Plan, members of the TFSG have completed the following actions:

- 1) Identified one target neighborhood and two background neighborhoods to receive a solicitation letter from USEPA asking for their participation in the dust study. The "target" neighborhood is essentially the part of the Stephen Foster (SF) Neighborhood adjacent to the Koppers site between NW 32 Ave and NW 26th Ave, east of NW 6th Street where there have been levels of dioxins measured above Florida standards. In the SF neighborhood, known commercial business properties along NW 6th Street were not included in the target parcels. There are 105 parcels selected in this neighborhood. The age of the homes in this neighborhood date from the 1950's, 60's, 70's and 80's. Size ranges from approx 800 sq ft to 2000 sq ft.

The "background" neighborhoods were selected by Dr. Cline and the TFSG based on their distance from the Koppers site (approximately 2 miles or more away) and the existence of previous soil sampling data showing no dioxin levels above Florida standards. Background neighborhood 1 is located west of the Koppers site between NW 45th Ave and NW 42 Ave near NW 21st Street. There are 134 parcels in Background neighborhood 1 and homes date

primarily from late 1970's early 80's some early 90's. Approx size range 1300 to 1700 sq ft. Background neighborhood 2 is located between W. University Ave and SW 6th Place southwest of the Koppers Site. There are 143 parcels in Background neighborhood 2 and homes date primarily from late 1970's to mid 80's. Approximate range 1600 to 2500 sq ft. (Map locations of the neighborhoods and parcels identified are included in the Attachments.)

- 2) ACEPD developed an Excel spreadsheet of parcel numbers, street addresses and owners name and mailing addresses for the proposed mail-out neighborhoods. (Attached).
- 3) Developed a letter template for 2 letters: one to go to the near site "target" neighborhood and one to go to the "background" neighborhoods soliciting participation. It is intended that this letter be on EPA letterhead and be signed by you. Our plan is that you place the text developed by the TFSG on EPA letterhead and sign and send the letters to ACEPD electronically. ACEPD will make copies to put in mailing envelopes with a Fact Sheet and Access Agreements and Survey Questions. We will need to have USEPA mailing envelopes sent to ACEPD so that the mailouts will have a USEPA return address (maybe these can be postage paid). ACEPD will put the owner address labels and mail the letters out locally. Alternatively, if you prefer ACEPD can prepare the envelope packages and send them to you in Atlanta to mail to the homeowners. The TFSG would prefer to send the letters out locally to expedite the process.
- 4) Developed a FACT Sheet with Frequently Asked Questions to be sent out with the letters providing more information to homeowners. (See Attached)
- 5) Developed a revised version of the USEPA Access Authorization Form which contains Survey Questions on the back to be completed and signed and mailed back to ACEPD. (See Attached)
The completed Access forms will be copied and the originals sent to EPA. The EPA Form in the Attachment was revised only to clarify the start date of sampling and to indicate that the form should be sent to ACEPD. All other language is the same as the original EPA form.
The Survey questions are those that members of the TFSG thought were important to ask for the prescreening and matching process. Lynn Wilder from CDC and Anthony Dennis and FDOH made some suggested additions. There are other data that will need to be obtained about each selected home during the actual sampling process. We were trying to keep this list short but include key ideas from everyone.

ACEPD has received input and review from Lynn Wilder at ATSDR and from Randy Merchant and Anthony Dennis at the Florida Department of Health on the draft letters, fact sheets and questionnaire. We have included many of their suggestions.

It is the intent of the TFSG to be able to receive the completed Access Forms and Surveys directly and review them to try to best match the homes in the background neighborhood with the SF neighborhood in terms of answers to survey questions and other physical characteristics. This is intended to aid the statistical validity of the sample selection process. The TFSG is proposing to

then recommend the 15 background homes and 15 SF homes to EPA for sampling.

After EPA Review and approval of the implementation steps, the TFSG with ACEPD, and ACHD and the City will begin contacts with Neighborhood Associations and prepare some media releases to explain the upcoming sampling effort in order to encourage participation in the study. Pat Cline has already gauged some interest from one background neighborhood.

The TFSG will provide comments and review to USEPA in reviewing the final results and ACEPD would like to have some local oversight of the sampling and the testing effort.

Issues that may need further discussion and clarification and review include:

- 1) How to maintain confidentiality of the data. This would have to be in accordance with Florida public records laws. We need to decide if we need a statement in the fact sheet. We are waiting legal advice from County Atty office on this issue.
- 2) The logistics of mailing out the letters. Who mails out, who pays for postage, what is the most efficient way to do this
- 3) What is the anticipated timing of sending out the letters.
- 4) We need to get USEPA's written agreement to this implementation plan and procedures?
- 5) Does USEPA have any suggested changes to the Attached documents?
- 6) Is USEPA agreeable with the public outreach planned by the TFSG?
- 7) What are other factors (like lab capabilities and scheduling that have to be considered and planned? Does EPA know who will implement the plan?

Please review the attached information. **We would like to have a conference call with you on Monday or Tuesday of next week to go over the information and get your comments and suggestions.** Pat Cline will be out of the Country after Tuesday so we would like to have the call before then. Let me know you available times on those days and let me know if you can arrange a conference line for us to call in on.

Let me know if you have any questions.

Thanks,

John Mousa
Have a nice weekend!

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