Alachua County
Environmental Protection Department

Chris Bird, *Director*

April 29, 2009

Mr. Scott Miller
Remedial Project Manager
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: Alachua County and City of Gainesville Comments on On–Site Human Health Risk Assessment for the Koppers Superfund Site prepared by AMEC Earth and Environmental , January 29, 2009.

Dear Scott:

The Alachua County Environmental Protection Department (ACEPD) and the City of Gainesville (City) with the assistance of Dr. Pat Cline, have reviewed the document "Evaluation of Potential On-Site Human Health Risks Associated with Soils and Sediments at the Koppers Inc. Wood-Treating Facility in Gainesville, Florida , Prepared by AMEC Earth & Environmental Westford, Massachusetts Jan 29, 2009" (HHRA). This report provides risk estimates for exposure to contaminants in on-site surface soil and surficial sediments based on current site activities at the Koppers Site. In letters dated August 8 and August 15, 2008, ACEPD and the City had previously submitted to USEPA comments on the AMEC proposed HHRA approach. In a letter dated February 20, 2009, AMEC provided responses to the ACEPD and City comments. We do not believe that all of our previous comments and concerns on the approach to the HHRA were satisfactorily addressed in the AMEC response. The following comments present what we believe to be important remaining issues of concern to ACEPD and the City with the HHRA affecting the use of the risk assessment to evaluate remedial actions for surface soils and sediments at the Koppers Site.

1) The City and ACEPD's preferred goal is for the soils at the Koppers Site to be cleaned up to residential soil clean- up standards. We understand that USEPA has indicated that this is not technically feasible and that USEPA has stated that the site soil remediation will be to industrial/commercial standards. If that is the case, then the City and County request that the soil cleanup levels in <u>all</u> the exposure areas must <u>at a minimum</u>:
    - meet FDEP target risk level of $1x10^{-6}$,
    - be based on exposure assumptions that are consistent with reasonable alternate future commercial use of this property.

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The City and ACEPD believe that use of exposure assumptions based on current or historical operations of the Koppers Site are not appropriate for identifying the areas of the site that may require remediation to meet FDEP risk levels. We understand that USEPA is required to consider reasonable alternative future land uses for the site. Discussions about future land use for the Koppers site are being planned. The exact nature of future land uses for the site has not been established. Therefore, the City and ACEPD request that all site soils, especially soils in areas where engineering controls are not contemplated in the final remedy, meet minimum clean-up standards to allow for the greatest amount of flexibility and protection in future land uses.

The statement in the HHRA that *"current on-Site worker characteristics closely corresponded to the default assumptions U.S. EPA would typically use to characterize a generic industrial worker"*[1] inaccurately implies that all conclusions from this assessment address future site uses. For the deterministic calculations, in some areas some assumptions (worker exposures for 250 days/year for 23.9 years) are near the default assumptions. However, in less active areas of the site, the exposure assumptions (e.g. number of days per year and hours per day) are much lower. As a result, clean up levels in these areas would be less stringent and limit reasonable alternate future uses.

2) Risk-based cleanup decisions based on the Microexposure Event Model (MEE) are not acceptable for a final remedy. The MEE uses numerous assumptions that are not consistent with regulatory requirements, are very site specific, and underestimate exposures. For example:

    a. The toxicity distributions and relative absorption factor based on literature values are not consistent with regulatory requirements for these assumptions.
    b. The soil ingestion rate is inappropriately low for this site. Dr. Calabrese confirmed in a personal communication with us that soil ingestion rates developed for his study on the Housatonic River Site would not be applicable for workers at the Koppers Site. We recommend that EPA contact Dr. Calabrese regarding this issue.
    c. The job tenure distribution (e.g.70 percent of workers would be employed at the site for less than 1 year) is questionable[2] and would not be appropriate as the basis for determining cleanup for typical commercial uses.

3) The analysis includes a "Northern Inactive Area" that is assumed to be uncontaminated. No samples have been collected in this area for confirmation. Five of the six adjacent samples have concentrations of benzo(a)pyrene equivalents that exceed Florida's commercial industrial soil cleanup target levels. Therefore, delineation in this area is not complete and current data are not adequate to determine whether this area would meet criteria for

[1] Feb 29, 2009 Comment 1 Responses on the risk assessment approach.

[2] The development of this Koppers specific distribution for job tenure ignores office workers, the length of time currently active employees have worked at the site and tenures for workers terminated after 1970 that were hired prior to that date. The distribution that estimates risk assuming 20% of workers were employed less than 1 month at the site is unrealistic for establishing commercial industrial cleanup levels.

future uses. The City and ACEPD request that additional soil testing be performed in this area to document soil concentrations to make sure it is below risk criteria.

4) The remedial actions for the site must also consider migration pathways of leaching to groundwater and migration of contaminants in surface soil or sediments offsite. Additional studies of sediment contamination offsite in Springstead Creek are just being completed by ACEPD and will present a more complete picture of potential offsite transport from Koppers sediments. In addition offsite soil sampling has just recently been completed by AMEC. These additional data reports should be considered in the evaluation of offsite transport through windblown surface soils and stormwater runoff resulting in offsite contaminated sediments.

We thank you for the opportunity to comment and provide input to this HHRA document and appreciate USEPA's continued commitment to a comprehensive remedy for the contamination at this site. Please contact me at 352-264-6805 or via e-mail at jjm@alachuacounty.us if you have any questions or concerns.

Sincerely,

John J. Mousa, Ph.D.
Pollution Prevention Manager

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