



Alachua County Environmental Protection Department

Chris Bird, Director

June 15, 2010

Mr. Scott Miller
Remedial Project Manager
US EPA Region 4
61 Forsyth St. SW
Atlanta, GA 30303

Re: Short Term Interim Measures- Preliminary Stormwater Design and Dust Control Measures

Dear Scott:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the Short Term Interim Measures Workplan submitted by GeoTrans on behalf of Beazer East, Inc of the Koppers Superfund Site dated June 2, 2010. ACEPD has supplied the City of Gainesville with input on the Demolition portion of this plan for their consideration in reviewing the application for the demolition permit for facilities on the site. ACEPD's demolition comments will be communicated by the City as appropriate. This letter focuses on the ACEPD comments and issues with the proposed stormwater best management practices and interim stormwater design proposed in the plan. These comments are also being forwarded to Mr. Jeff Martin of the Florida Department of Environmental Protection (FDEP) NE District for his consideration in the stormwater permit application submitted by Beazer.

From discussions with FDEP and review of the Permit Application included in the Short Term Interim Measures Plan, it appears that Beazer has submitted an application to FDEP for Site Specific and not a Generic Discharge Permit. ACEPD supports a site specific and not a generic permit for the site. ACEPD and the local community have been urging expedited actions by USEPA and Beazer to stem or mitigate the continuing discharge of contaminants in stormwater from the Koppers Superfund site. In the Short Term Interim Measures Workplan, Beazer has proposed some stormwater control and dust control measures to reduce dust and help reduce the discharge of contamination in stormwater from the site. ACEPD has the following concerns about the interim stormwater plan and dust control measures and the FDEP permit application that we request be addressed by USEPA and FDEP.

- 1) The FDEP Permit application does not take into account that other site related contaminants in addition to arsenic, copper and chromium may be exiting the site via stormwater. ACEPD has recent stormwater monitoring data that indicates that low levels of dioxins and polynuclear aromatic hydrocarbons (PAHs) may be exiting the site via stormwater. This data will be transmitted to FDEP, USEPA and Beazer the week of June 14, 2010. These additional parameters along with turbidity and hardness should be included as measured parameters. Hardness is needed to evaluate copper and chromium in comparison to Florida Class III Surface Water Criteria. ACEPD also recommends that flow and field parameters be measured when collecting "first flush" stormwater samples.

- 2) The plan does not specify how dust generation will be controlled during the root raking and discing operations.
- 3) ACEPD is concerned that raking and discing operations proposed in the preliminary stormwater design for the western area of the site will tend to mix the soils in the upper 6 to 12 inches of soil that in some areas contains contaminants significantly above FDEP Commercial Industrial SCTL levels. The Final FS for the site indicates that some of these highly contaminated soils may be removed by excavation in the final remedy for the site. In addition, ACEPD and the City of Gainesville have indicated to USEPA that it is the local preference that as much of the contaminated soil above SCTL levels in the western area be removed in the final remedy. ACEPD is concerned that the raking and discing operations proposed will change the concentration of contaminants in the soil at locations with currently elevated levels by dilution with deeper soils and make the location of contamination hot spots in the future difficult and affect the plan to remove contaminated soils from the site. ACEPD wants assurance from Beazer and USEPA that the root raking, discing and seeding and mulching operations in the interim plan will not prevent the removal of soils that contain elevated levels of contaminants from the final soil remedy nor be considered the final remedy for contaminated soils on site and that the concentration of the soils prior to this operation will be used to identify areas that require removal in the final remedy.
- 4) Some areas of the site have been seeded with grass and are relatively stable with a mixture actively growing grass and annuals or other perennials. Where areas are already vegetated and appear stable, ACEPD recommends not to root rake and disc, but over seed the area with mixture that includes bahia.
- 5) ACEPD recommends removal of invasive exotic plants site-wide, particularly in the wooded area in the northwest portion of the site. The primary invasive exotic in the northwest area is air potato, *Dioscorea bulbifera*, which can easily be spread vegetatively by aerial tubers.
- 6) Excessive off-site tracking of soils from the site during demolition and stormwater interim plan implementation activities should be prevented.

ACEPD appreciates your consideration and addressing of these concerns. If you have any questions, please contact me.

Sincerely,



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

Ashwin Patel, FDEP NE District
Kelsey Helton, FDEP
Fred Murry, Asst City Manager, Gainesville
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