



# ***Alachua County Environmental Protection Department***

**Chris Bird, Director**

October 29, 2009

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

Re: ACEPD Comments on AMEC Report "Fugitive Dust Impacts Predicted from Air Dispersion Modeling Koppers, Inc. Wood Treating Facility Gainesville, FL dated August 17, 2009

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the AMEC Fugitive Dust Modeling Report referenced above for the Koppers Wood Treating Facility dated August 17, 2009 and has the following comments. ACEPD's comments are supported by a review of the report by MACTEC Engineering and Consulting, Inc. (MACTEC)(attached), an engineering firm with expertise in air monitoring and modeling

1. Based on the analysis by MACTEC of the assumptions and values used in the modeling, it appears that AMEC has not used conservative estimates of the values for several factors such as vehicle weight, vehicle speed and silt content and therefore the report underestimates the estimates of risk from inhalation of fugitive dust from the site. The modeling used values that are near or at the lower end of all ranges for vehicle weight, vehicle speed and silt content for the soils.
2. MACTEC indicates that the utilization of emissions estimates from vehicles was used incorrectly in the modeling equations.
3. The AMEC report does not model deposition offsite and as such cannot be used to predict whether there will be an accumulation of contaminants offsite with the level of fugitive dust from the site. Also the receptor grid was not extended offsite to residential properties.
4. The AMEC report does not address potential future releases from uncovered contaminated areas including impacts if activity patterns change.

Based on MACTEC's review of the AMEC Modeling report, ACEPD questions the validity of the conclusions of the AMEC report that fugitive dust emissions are not now nor will be in the future an inhalation risk. The report also does not address continued potential offsite deposition risk from the Koppers site. These deficiencies need to be satisfactorily addressed by AMEC or an air monitoring program needs to be established around the Koppers site to document whether there are any health or

long term exposure issues to neighboring residences or properties.

We appreciate the opportunity to comment on this report. If you have any questions about our comments please contact me at 352-264-6805.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Mousa". The signature is fluid and cursive, with a long horizontal stroke at the end.

John J. Mousa, Ph.D.

Pollution Prevention Manager

Attachment 1: Preliminary Evaluation of AMEC Fugitive Dust Report by MACTEC October 7, 2009

CC: Fred Murry, Asst City Manager  
Chris Bird, ACEPD  
Rick Hutton, GRU  
Anthony Dennis, FDOH  
Randy Merchant, FDOH  
Dr. Pat Cline  
Kevin Koporec, USEPA  
Kelsey Helton, FDEP  
Paul Anderson, AMEC  
Mitch Brouman, Beazer East  
Bill Barnard, MACTEC