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Cc: [Gus Olmos](#); [Robin Hallbourg](#)
Subject: ACEPD Comments on Short Term Interim Measures Workplan - Koppers - Demolition and Stormwater Plan
Date: Monday, June 14, 2010 11:52:00 AM
Attachments: [1658 Beazer Submitted to FDEP Koppers Site Closure Plan 4-16-2010.pdf](#)
[FW tank demolition KoppersBeazer.msg](#)

Mr. Fredrick Murry
Asst. City Manager
City of Gainesville

Dear Fred,

ACEPD has reviewed the Short Term Interim Measures Plan submitted to the City and ACEPD by GeoTrans for Beazer East (dated June 1, 2010) in support of the demolition permit application for the facilities at the former Koppers Wood Treating plant, and the Preliminary Stormwater Design Report submitted in support of an application to the FDEP NE district for an NPDES discharge permit. ACEPD's comments on the Interim Stormwater Plan are also being transmitted to USEPA and FDEP NE District.

Demolition Plan

Concerning the demolition plan for structures and tanks at the Koppers site, the plan appears to address dust and noise control during demolition activities. Water trucks are proposed to be used to keep the soils near the demolition activities wet as well as the building materials and the roadways on the site. Graplers are being used to tear down the buildings and structures instead of wrecking balls to minimize noise and dust generation.

Beazer through its contractor, Chemron, has previously submitted to FDEP NE district a Closure Plan for the Drip Pad and Ancillary Units dated April 16, 2010 that documents in writing the measures and approached that will be taken the closure of FDEP regulated facilities at the site. (see attached files). FDEP NE district has responded to Chemron with some questions and requests for information which have been subsequently responded to by Chemron (See attached files). A diagram of the Decontamination Area and a schematic showing the locations of Decontamination Area has been supplied to FDEP and is included here (see attached files).

ACEPD has the following recommendations to the City regarding the Demolition Plan:

- 1) The watering dust control procedures during demolition and other site activities should specify the frequency and conditions where watering will be used to control dust.
- 2) All FDEP required procedures must be followed during decontamination and demolition activities:
- 3) The demolition plan should include a contingency plan for dealing with excess water that may accumulate in the decontamination area during heavy rainstorm

events that could be expected in the summer months. The water may be contaminated and must be disposed of properly.

- 4) The demolition and health and safety plans submitted do not appear to recognize that soils on the site contain elevated levels of dioxin and PAH compounds as well as Arsenic and Chromium. Worker health and safety plans should address the exposure potential and appropriate personal protective equipment for on-site workers.
- 5) Noise Control – Hours of operations for demolition activities are specified as 7AM to 5PM Monday to Saturday. Concrete breaking activities are limited to 8AM to 4 Pm Monday to Friday to mitigate noise to surrounding residents. ACEPD recommends that the City may consider requesting that all noise producing demolition activities be limited to 8am to 4 pm Monday to Friday to provide and extra level of noise protection to neighbors.
- 6) Unused or abandoned wells are commonly found during demolition of structures. Abandoned or improperly grouted wells may serve as vertical conduits for movement of contamination into the intermediate and Floridan aquifer systems. The site is in the FDEP Delineated Area and If a well is encountered, the SJRWMD should be contacted and the well evaluated, sampled and properly plugged and abandoned per their requirements. This requirement should be stated in the Demolition work plan.
- 7) As soils on site will be wetted down to control dust, tracking of potentially contaminated soils offsite from heavy construction equipment used on site during the demolition operation is a possibility. Therefore, procedures must be developed in the plan for prevention of offsite tracking of soils on to city streets.

Interim Stormwater Design and Stormwater Permit Application

From discussions with FDEP and 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. FDEP has rejected previous Beazer requests to apply for a Generic Stormwater Discharge Permit. Beazer has submitted the Preliminary Stormwater Design Report to describe some interim Best Management Practices measures that FDEP has required as part of the Permit Application process. These interim BMP practices may become part of the final NPDES permit. 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. Therefore, ACEPD is generally supportive of the proposed procedures in the interim plan to control the potential for generating contaminated stormwater from the Koppers site. ACEPD however has the following concerns and and issues that need to be adequately addressed in the plan:

- 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.