

**From:** [Robert Pearce](#)  
**To:** [Martin, Jeff](#)  
**Cc:** [Wiggins, Katy](#); [John Mousa](#); [Pearson, Stewart E.](#); [Helton, Kelsey](#); [Murry, Fredrick J.](#); [Hutton, Richard H](#); [Robin Hallbourg](#); [Cline Patricia](#)  
**Subject:** Re: Administrative Order/Stormwater Discharge Permit for Koppers/Beazer Site in Gainesville  
**Date:** Thursday, June 02, 2011 8:16:45 AM

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Thank you, Jeff.

At the time of my e-mail, I had not seen the new (draft) permit. The AO had been forwarded to me (without the dioxin/furan requirement), but not the permit. I later found that on the ACEPD web-page.

I must confess, some of this is a little over my head.

It seems to me that the AO and the Permit requirements should be consistent, but if you say the dioxin/furan discharge monitoring requirement is covered, ok.

Thank you,  
Robert

On Thu, Jun 2, 2011 at 8:06 AM, Martin, Jeff

<Jeff.Martin@dep.state.fl.us> wrote:

> Mr. Pearce:

> The current consent order is in place through the time before the permit is issued. Then the permit and Administrative Order (AO) both will be in effect. The way these documents work is that the AO describes and establishes interim requirements for total recoverable copper, total recoverable arsenic, total recoverable iron, trivalent chromium, total polycyclic aromatic hydrocarbons (PAH), Pentachlorophenol (PCP) and a schedule for compliance. The AO runs concurrently with the Permit.

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> Since dioxin/furans is not in the AO, the permit describes the sampling requirement on a quarterly basis (page 5 of the permit). So for a qualifying storm water discharge from the site, the collected sample must be analyzed for dioxin/furans. Hope this helps to clarify the documents. I will give you a call either today or on Friday to discuss. Thank you for your comments,

> Jeff

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> The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Copy the url below to a web browser to complete the DEP survey: <http://survey.dep.state.fl.us/?refemail=Jeff.Martin@dep.state.fl.us> Thank you in advance for completing the survey.

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> From: Robert Pearce [<mailto:robertpearce2000@gmail.com>]

> Sent: Wednesday, June 01, 2011 8:15 PM

> To: Wiggins, Katy

> Cc: John Mousa; Pearson, Stewart E.; Martin, Jeff; Helton, Kelsey; Murry, Fredrick J.; Hutton, Richard H; Robin Hallbourg; Cline Patricia

> Subject: Administrative Order/Stormwater Discharge Permit for Koppers/Beazer Site in Gainesville

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> Dear Ms. Wiggins:

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> The Assistant City Manager forwarded to me the most recent Draft Administrative Order associated with the stormwater discharge from the Koppers/Beazer site in Gainesville.

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> Perhaps I am missing something, but it appears to me that whereas the Consent Order dated October 6, 2010 and the Preliminary Draft Stormwater Discharge Permit both required monitoring the discharge of Dioxins/Furans from the Site, the current Draft Administrative Order does not.

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> Am I reading the documents correctly? And if so, why was this requirement deleted?  
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> Thank you,  
> Robert Pearce  
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