

From: bob_palmer
To: Randy_Merchant@doh.state.fl.us
Cc: Miller.Scott@epamail.epa.gov; Kelsey.Helton@dep.state.fl.us; Anthony_Dennis@doh.state.fl.us; [John Mousa; Sharon_Watkins@doh.state.fl.us](mailto:John_Mousa; Sharon_Watkins@doh.state.fl.us); David_Krause@doh.state.fl.us; Carina_Blackmore@doh.state.fl.us; Lu_Grimm@doh.state.fl.us; Paul_Myers@doh.state.fl.us; kygress@ufl.edu; pcline@ufl.edu; Gus.Olmos; [Joe Prager; mperri@php.ufl.edu](mailto:Joe_Prager; mperri@php.ufl.edu)
Subject: Re: DOH Response to Your 10-15-10 Letter to EPA
Date: Friday, October 29, 2010 12:28:40 PM

Thanks, Randy, for forwarding this letter.

I am delighted that you wrote that "Florida DOH generally does not recommend health surveys". The use of the word "generally" suggests to me that in some cases Florida DOH would in fact support a health survey, as it has done in other parts of the State in the past. We seem to be in agreement that a good survey is hard to do (and you have listed many confounding factors in your letter). But it's not impossible. This is why we hoped to involve DOH at the earliest opportunity – to gain from your expertise in order to maximize the chances that the survey would in fact be valid and credible. I suspect that it will be harder, but not impossible, to do this without DOH.

Your penultimate paragraph lists the various things that DOH has done to assess health risks around the Cabot-Koppers site. All of these activities are helpful but none accomplish what a comprehensive health survey would accomplish. The cancer incidence study will be very welcome, but it remains a promise, at least two years after it was requested by local residents and local elected officials. Even when completed, it will have nothing to say about non-cancer impacts. Since we haven't seen the design of that study, we are not even sure if it will have something to say about all cancers, or just a selected few, or if the survey size will be adequate to draw statistically valid conclusions. The two published reports you refer to on risks from surface soils are of some use, but they are hardly comprehensive. Since the risks discussed in these reports are based solely on current levels of contaminants in soils, one can draw no solid conclusions from them about the cumulative long-term effects that air-borne, water-borne, and soil-borne contaminants may have had on local residents over the past several decades. These soil reports also suffer from methodological problems, such as the fact that contaminant concentrations were diluted when Beazer's contractor took these samples to a depth of six inches, which is not the methodology recommended by either Federal or State guidelines.

My point is that a comprehensive health survey, properly designed and conducted, would make a unique contribution to our understanding of the health impacts resulting from the Cabot-Koppers site. I can understand that DOH may have bureaucratic and budgetary imperatives operating that contribute to your lack of enthusiasm. But, because of the talent pool at our local universities and local health agencies, it seems quite possible to me that the proposal health survey could be conducted in a thorough and credible manner. It would be a shame if DOH chose to distance itself from a study that ultimately proved to be valuable. Hopefully, this won't be the case, and we will make every effort to stay in touch with you in an effort to lessen your concerns about the survey's design.

All the best,

Bob Palmer

--- On **Fri, 10/29/10, Randy_Merchant@doh.state.fl.us**
<Randy_Merchant@doh.state.fl.us> wrote:

From: Randy_Merchant@doh.state.fl.us <Randy_Merchant@doh.state.fl.us>
Subject: DOH Response to Your 10-15-10 Letter to EPA
To: rpa711@yahoo.com
Cc: Miller.Scott@epamail.epa.gov, Kelsey.Helton@dep.state.fl.us,

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Date: Friday, October 29, 2010, 11:39 AM