

100316 map submitted by
Aud Mung
via email
9/27/2010

September 27, 2010

Mr. Mayor, Madam Chair, City and County Commissioners:

The Technical Advisory Committee for Protect Gainesville's Citizens would like to offer the following suggested revisions to the Local Intergovernmental Team Comments currently being prepared in response to EPA's Proposed Plan for the clean-up of the Koppers Superfund Site. The suggested revisions are indicated by ~~strike through~~ to remove, and underline to add.

1.0 GROUNDWATER & SUBSURFACE REMEDY INTRODUCTION

Page 11

6. We support the Slurry Wall and cap components of the Proposed Remedy. However, the ROD should also address UHG source areas east of the property boundary that are outside the slurry wall shown in the Proposed Plan. At the same time, the area within the proposed slurry wall or within alternate multiple slurry walls should be minimized as much as possible so as to maximize the redevelopable area of the site, but still provide necessary subsurface lateral containment.

2.0 ON-SITE / OFF-SITE SURFACE SOILS REMEDY COMMENTS AND RECOMMENDATIONS

Page 14

10. The USEPA Proposed Plan remedy for the surface soils and the future land use assumptions made by USEPA have not been sufficiently coordinated with the City of Gainesville and local stakeholders. Additional coordination with the City of Gainesville and local stakeholders is needed regarding the future land use vision. The final remedy for the Koppers site must meet the following minimum criteria:

....

- It should be compatible with a redevelopment scenario that includes a step down in land use types from east to west and from south to north on the site;
- At a minimum, the plan should provide for clean-up of all soils ~~in the western 300 ft of the site west and north of the proposed containment area to a level~~ that will allow redevelopment with any all residential land use ~~category categories that is consistent with the adjacent residential land use;~~ and

....

The Code of Federal Regulation (CFR) Chapter 40, Section 300.430 prescribes clear requirements for EPA's obligations for community involvement prior to and during the RI/FS process and through ROD development. EPA has ~~not met many~~ few of these obligations. For example, the required Community Involvement Plan was ignored for over 20 years and was only recently updated. The 1989 Community Involvement Plan (CIP) was required to be updated every 3 years (7 times during the past 21 years) to solicit comment from the community throughout the multiple RI, FS and RAO development processes. Instead, the first CIP draft since 1989 was produced after EPA released its Proposed Plan. Additionally, the required local information repository at the Alachua County public library was not kept up to date for

many years. These inactions on EPA's part denied local Gainesville residents the right to review key documents in the administrative record and provide crucial input to EPA during this period throughout the RI, FS, and remedy selection process. These inactions denied the community its rightful role in the selection of appropriate remedies for the site and in determining the types of future uses the site will accommodate following the remedial actions.

Page 15

The City of Gainesville has previously provided input to EPA regarding its vision for future redevelopment of the site. It is not clear and it has not been communicated to the local community how the USEPA's proposed remediation scenario for the site will impact or limit future redevelopment of the site and how it may comply with the City's redevelopment vision. In particular, USEPA's proposal to meet FDEP commercial soil clean-up target levels (SCTLs) and not residential SCTLs for surface soils in the areas outside of the containment area as well as the construction of a large soil consolidation area will significantly impact future land use and adversely impact the financial health and vitality of surrounding properties and neighborhoods. Additional coordination with the City of Gainesville and local stakeholders is needed regarding the future land use vision. The City of Gainesville and the LIT believe it is critically important to the local acceptance of any final remedy for the Koppers site that it meet the following minimum criteria described above.

....

Page 18

13. . . . USEPA should amend the FS and provide separate cost calculations for the alternatives of removal of all contaminated surface soils outside of the containment area that are above FDEP residential and commercial SCTLs and leaching criteria.

....

- Require removal of all contaminated surface soils outside of the containment area that exceed FDEP SCTLs or leachability SCTLs down to the water table.

Page 19

15. . . . The LIT strongly supports the proposed USEPA plan to complete the delineation of dioxin and other offsite contaminants to the state of Florida residential SCTLs for residential properties and FDEP commercial SCTLs for commercial properties. The LIT is against any effort to develop alternate clean-up standards for these offsite properties that will provide a lesser degree of protection of our citizens. State of Florida residential SCTLs should also be met on all properties currently associated with residential uses.

....

Additional offsite sampling should also be performed across NW 6th Street west of the Koppers site to assure that commercial and residential areas on and west of NW 6th Street have not been impacted.

Page 20

16. . . . USEPA should ~~consider~~ restricting the use of engineering or institutional controls for offsite properties.

3.0 OTHER OFFSITE IMPACTS
COMMENTS AND RECOMMENDATIONS

Page 22

17. . . . Because of this reasonable assumption and the increasing anxiety of local residents concerning this issue, the LIT requests that USEPA expeditiously take whatever actions are necessary to investigate and address this issue including sampling ~~if appropriate~~ within the homes (with the property owners consent) to determine the degree to which the interiors of these homes may have been impacted by contamination from the Koppers site and take appropriate remedial actions.

19. USEPA should provide relocation assistance during off-site and on-site remediation to residents adjacent to and near the site.

. . . .

Relocation assistance for residents adjacent to and near Superfund sites has been provided or required by USEPA at other Superfund site with similar contamination as the Koppers site and with similar proximity to residential property and receptors.

Page 24

21. Cleanup of the sediments in Hogtown and Springstead Creeks is proposed only for those areas where contaminants exceed benthic Probable Effects Concentrations (PECs). However, FDEP has determined that exposed creek sediments potentially pose human health risks. Additionally, cleanup of the on-site and off-site stormwater ditches that lead to Springstead Creek is not addressed in the remedial plan.

Contaminated sediments in both Hogtown and Springstead Creeks, and the on-site and off-site stormwater ditches must be excavated to the more stringent of the FDEP residential SCTL or the PEC for each chemical of concern. Excavated sediments should not be consolidated on-site.

In the Proposed Plan, USEPA has indicated that it plans to remediate creek sediments only where contamination exceeds the benthic Probable Effects Concentrations (PEC). This is inadequate. FDEP has concluded that the exposed contaminated soils in the streambed and in other exposed sediments in these creeks and ditches pose a potential human health risk.

For these reasons, contaminated sediments in both Hogtown and Springstead Creeks, and on-site and off-site stormwater ditches must be excavated to the more stringent of the FDEP residential SCTL or the PEC for each chemical of concern. Appropriate sediment confirmation sampling must be done after remediation to confirm that the excavation of these sediments is adequate.

. . . The LIT requests that USEPA require that excavated, contaminated creek and ditch sediments be disposed of properly in an approve landfill and not stockpiled on site.

Sincerely,

Robert Pearce
Former President of the Stephen Foster Neighborhood Association
Chair, Technical Advisory Committee for PGC