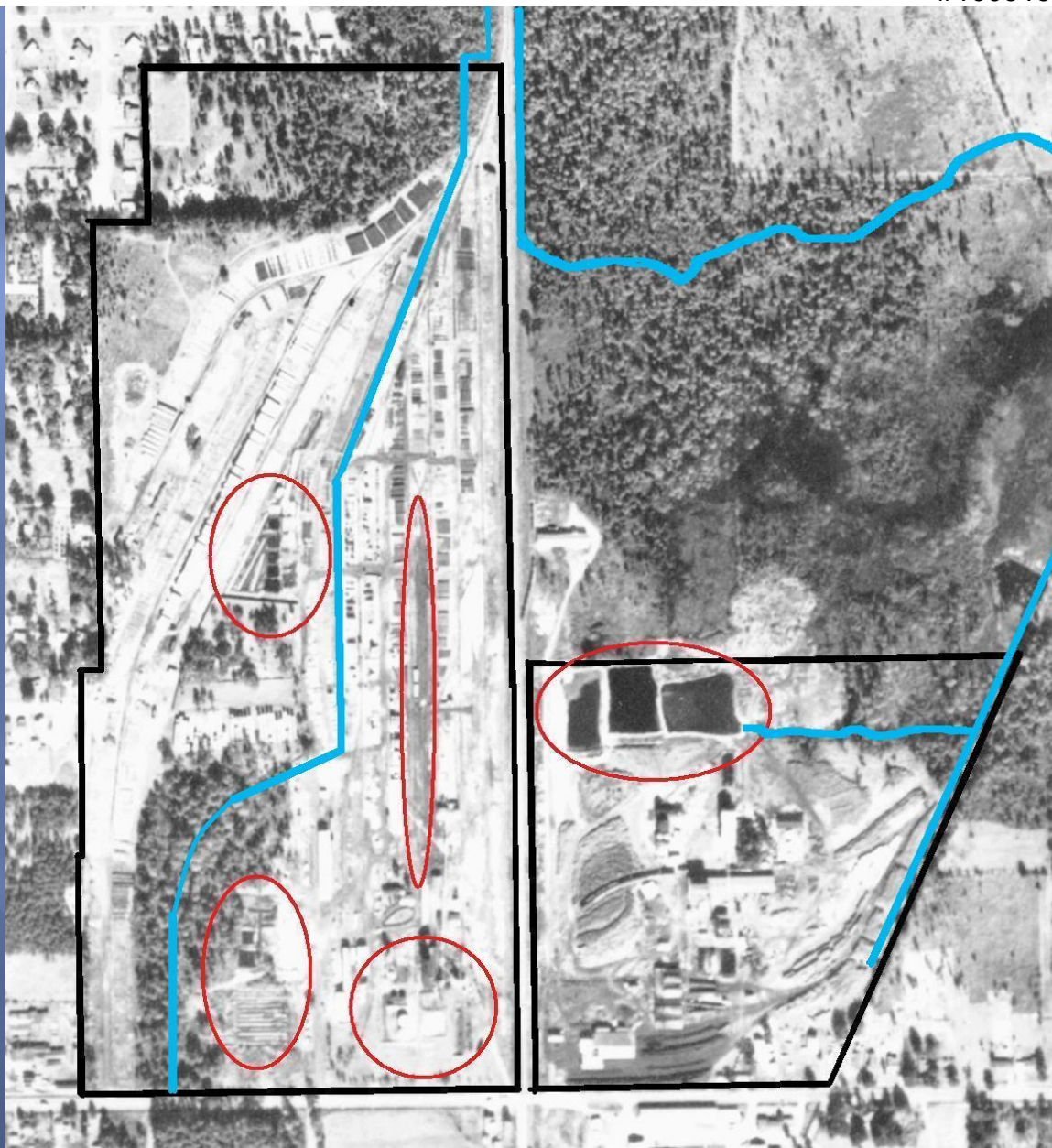


Response
to
EPA's Proposed Plan
for the
Cabot / Koppers Superfund Site

Joint City and County Commission Meeting
8/30/2010

Robert Pearce

Cabot/
Koppers
Site

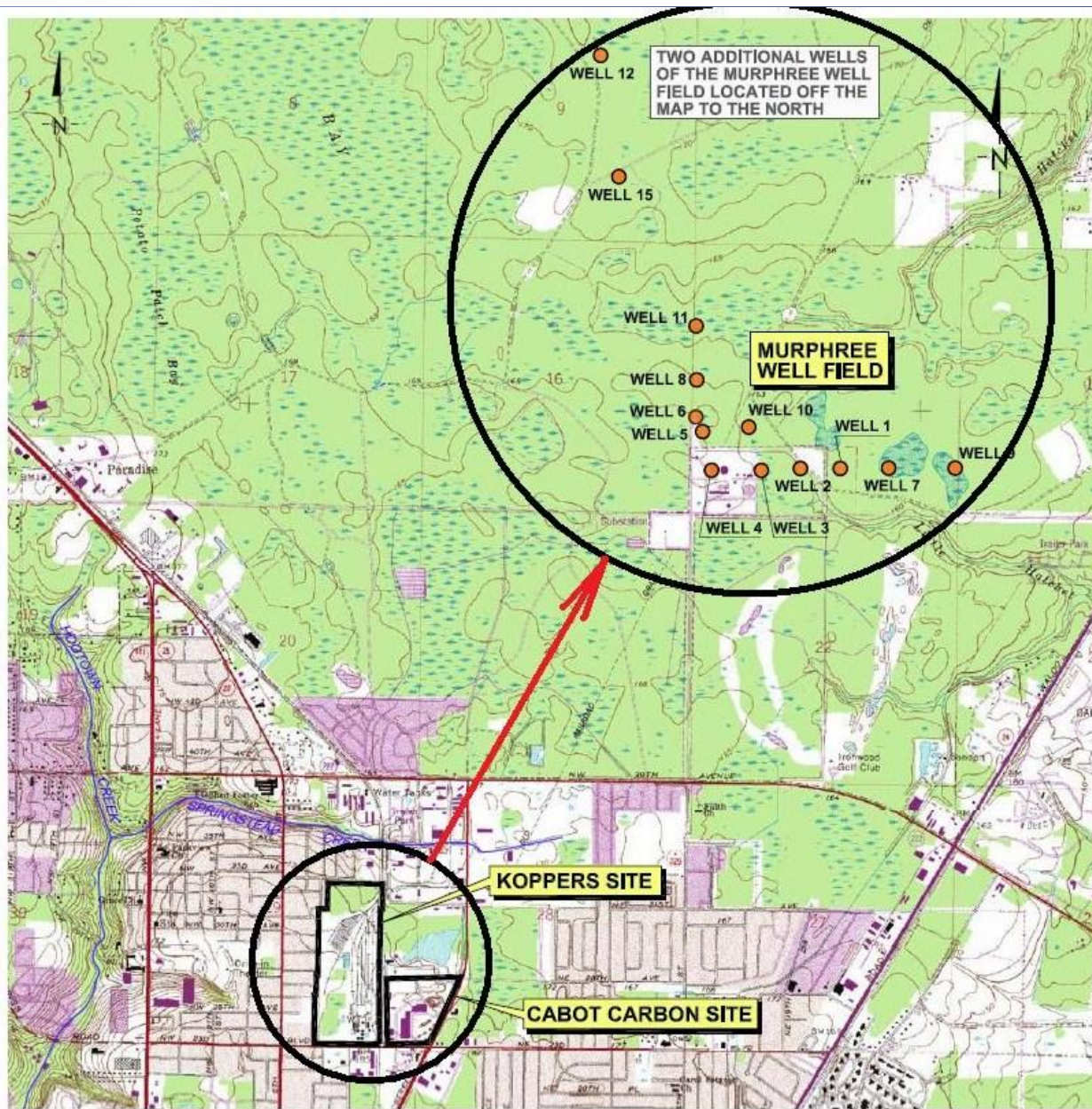


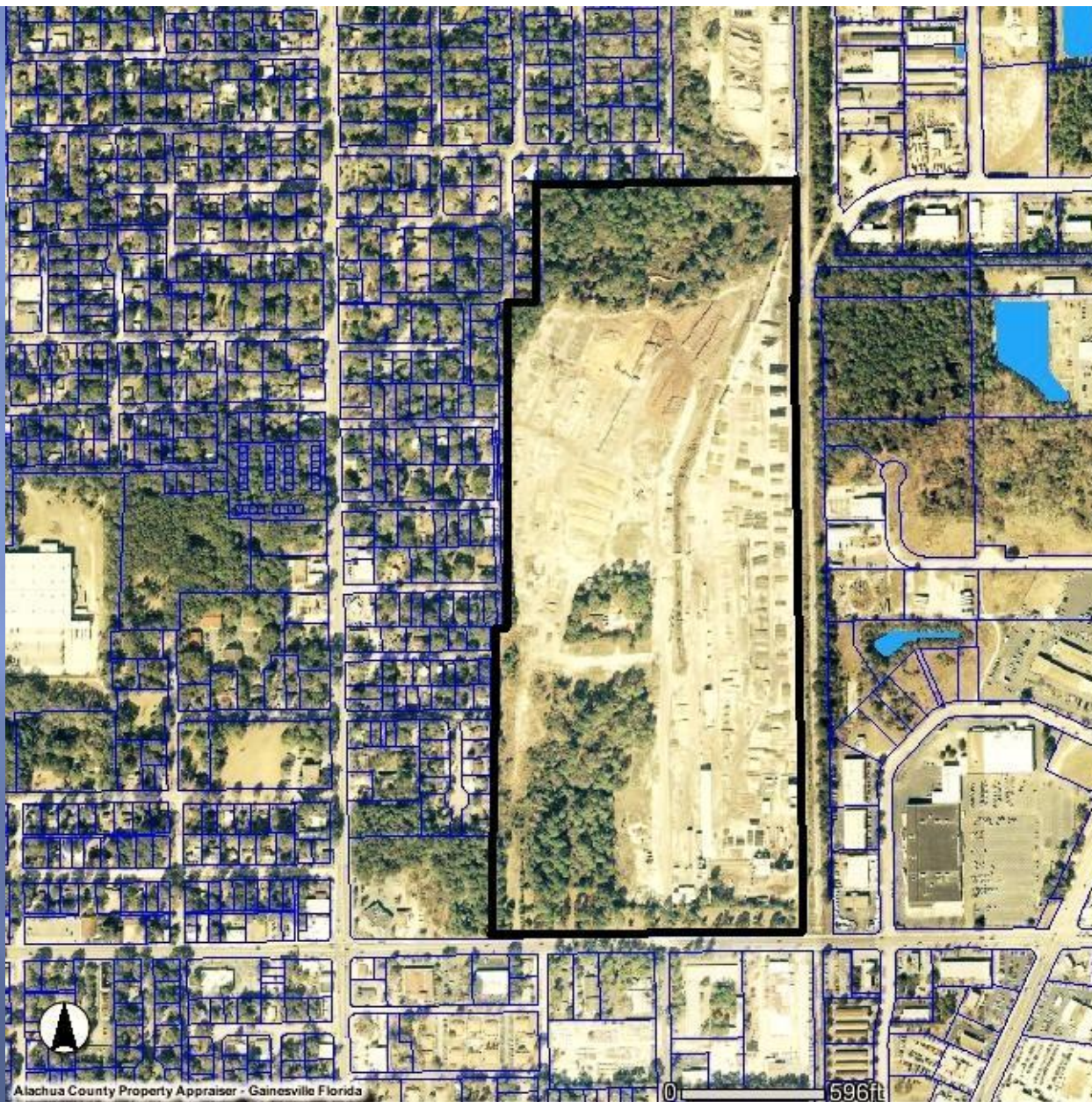
Responsible parties should be held accountable:

Interests of community, land, water resources

- Should be top priority
- Should be placed above the interests of culprits

EPA should require the contamination to be
cleaned up/not covered up



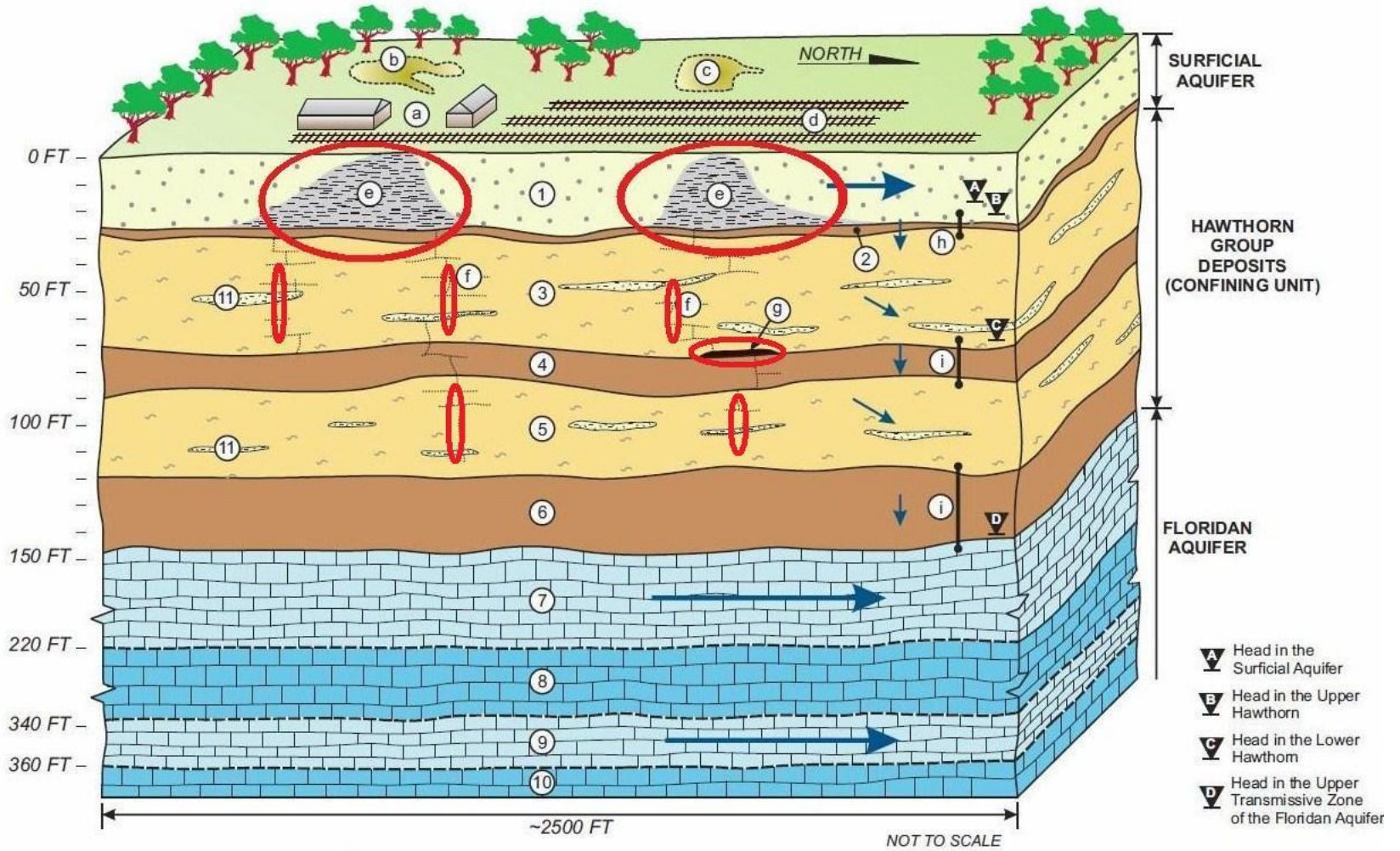


Issue #1

Primary Source Areas

- DNAPLs (Creosote)

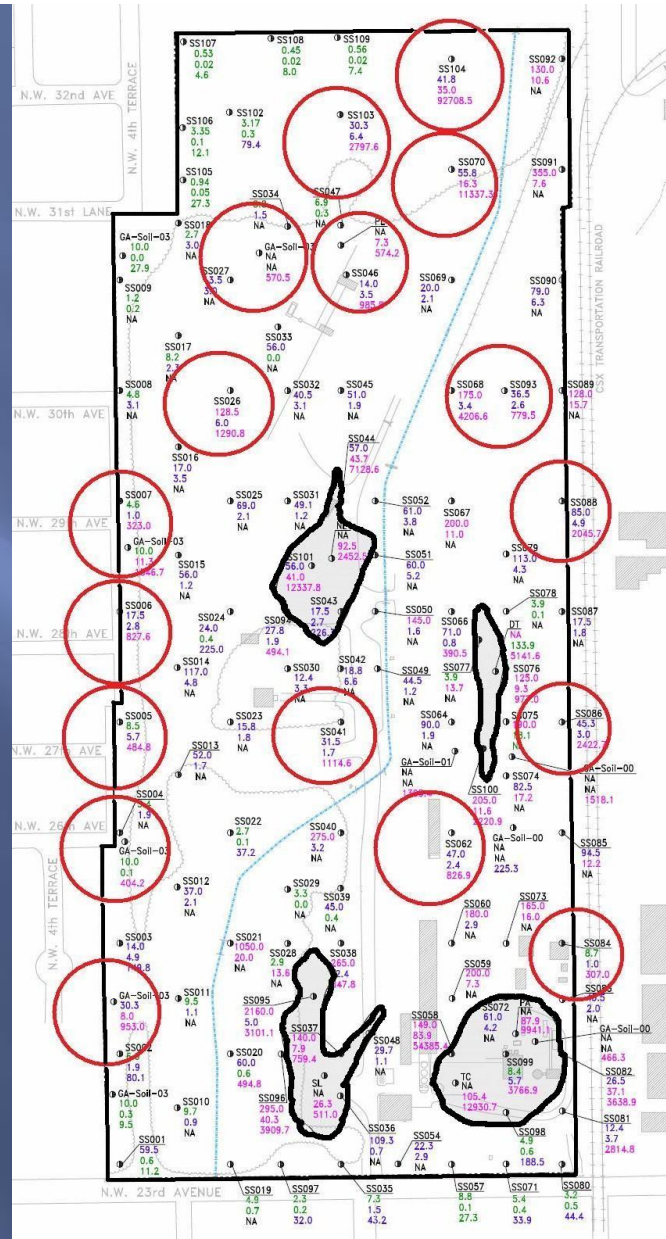


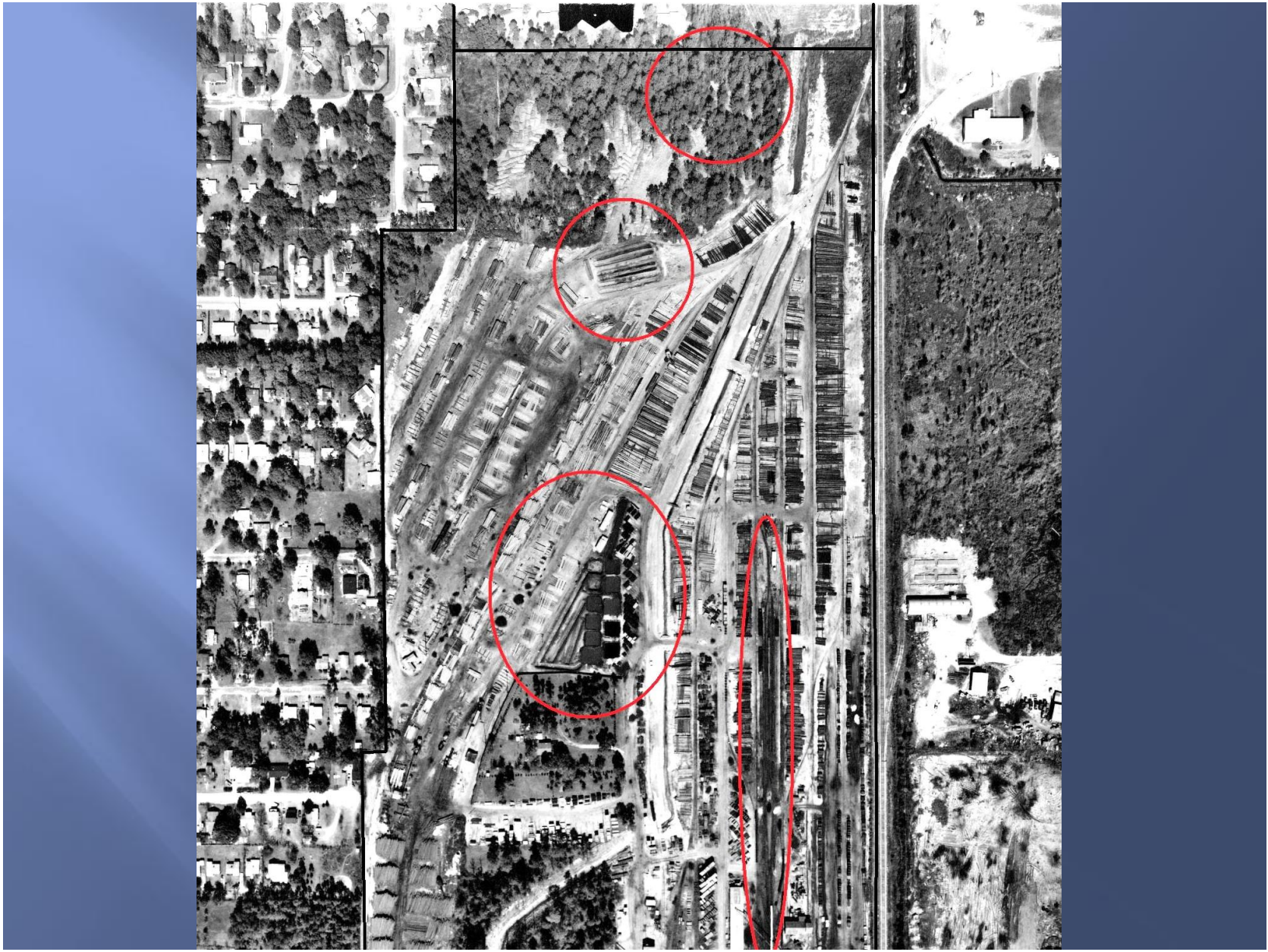


Issue #2

Surface Soils/

- Dioxin
- Arsenic
- Benzo(a)pyrene

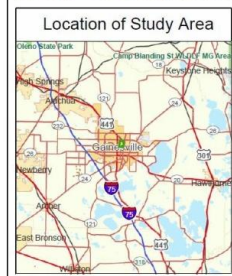




Issue #3

Off-Site Surface Soils





Off-Site Soil Sampling Results

Koppers, Inc. Facility
Gainesville, Florida

Beazer East, Inc.
Pittsburgh, Pennsylvania

Notes & Sources

Aerial Imagery source: <http://nikos.atlchina.com>, 2005.
Results in BLUE are above the residential direct exposure soil cleanup target levels of 2.1 mg/kg for ARSENIC, 0.1 mg/kg for BAPTE, and 0.00007 for TCDD TEQ. All soil samples collected from 0-0.5 ft below ground surface.

Legend

Sample Location	
Analyte	Concentration of analyte in mg/kg
U	Non-detect
J	Estimated value
●	Off-Site Soil Sampling Location
□	KI Boundary

0 400 Feet

amec

AMEC Earth & Environmental, Inc.
2 Robbins Road
Westford, MA 01886
(978) 692-9090

FIGURE 1

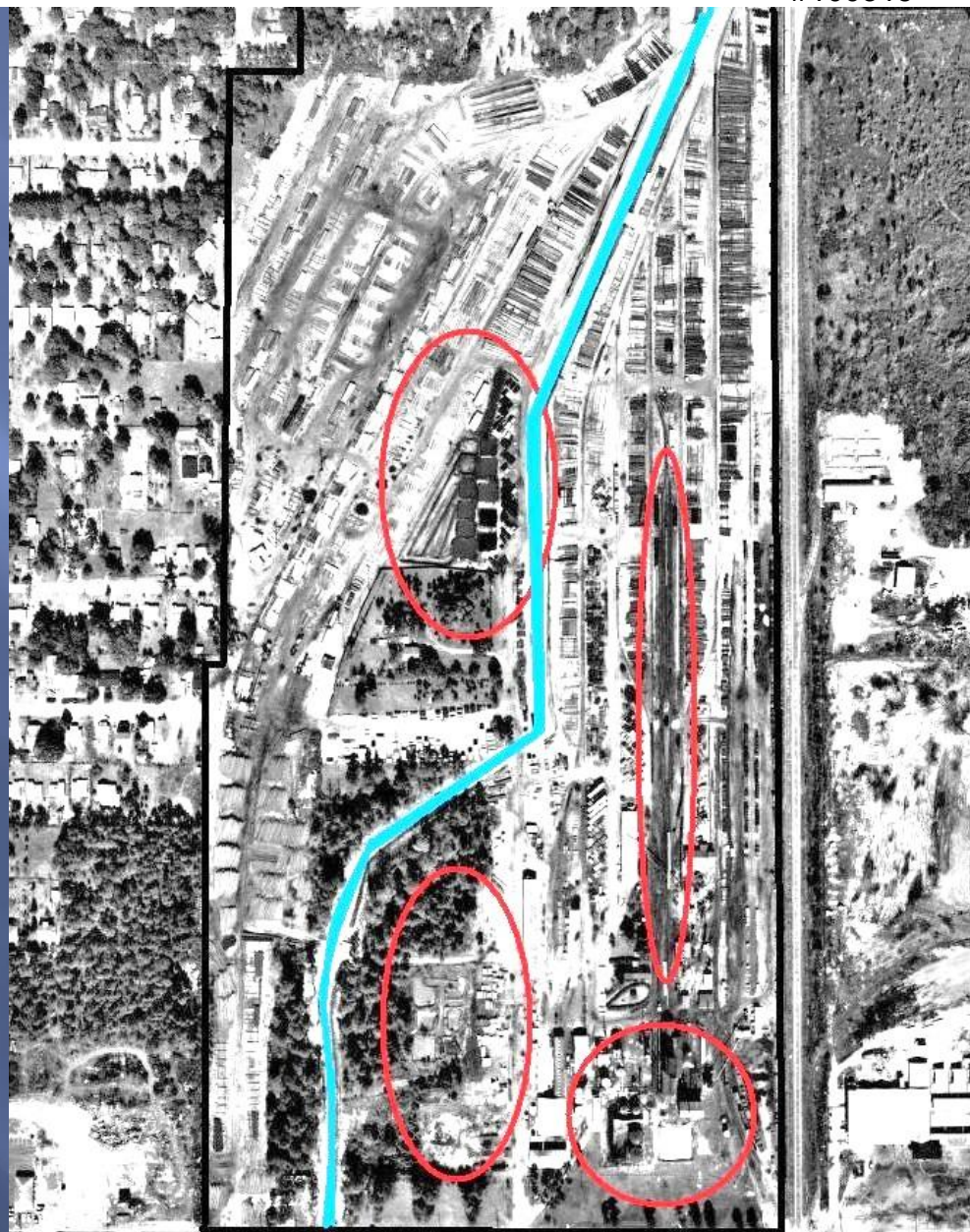
Issue #4 Contaminated Creek Sediments



Cabot



Koppers



#100315

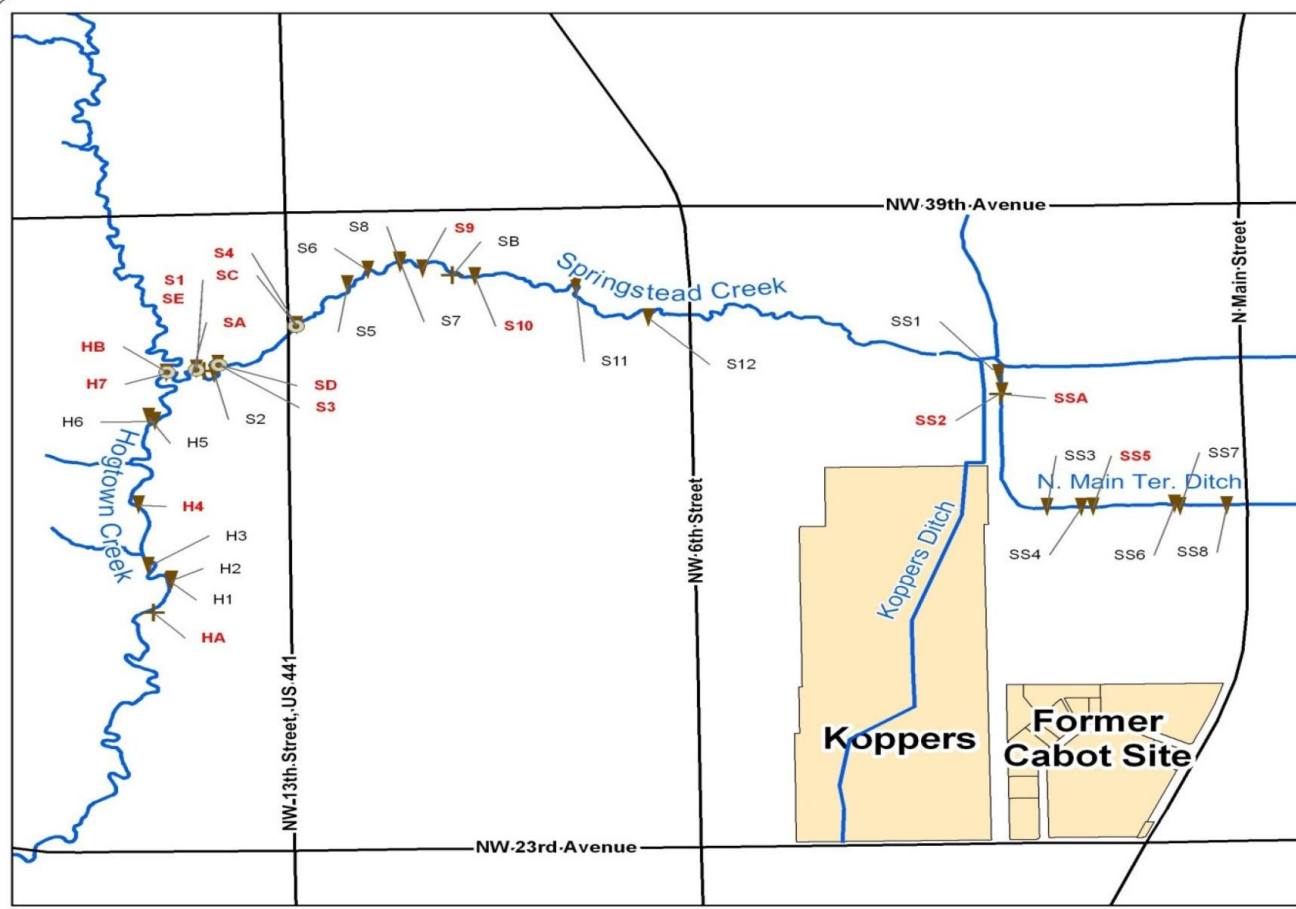
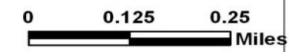




Sediment Reconnaissance Locations

Legend

- Transect
- Core
- Probe
- HA** Locations with Heavy Staining and Strong Odor
- Major Roads
- Streams
- Cabot Koppers Parcels



DISCLAIMER: This map and the spatial data it contains are made available as a public service, to be used for reference purposes only. The Alachua County Environmental Protection Department provides this information AS IS without warranty of any kind, implied or expressed, regarding accuracy, completeness, or fitness of use. The quality of the data is dependent on the various sources from which each data layer is obtained.

Issue #5

Community Input

EPA requirements:

Vigorously integrate community throughout process

Place heavy emphasis on community input

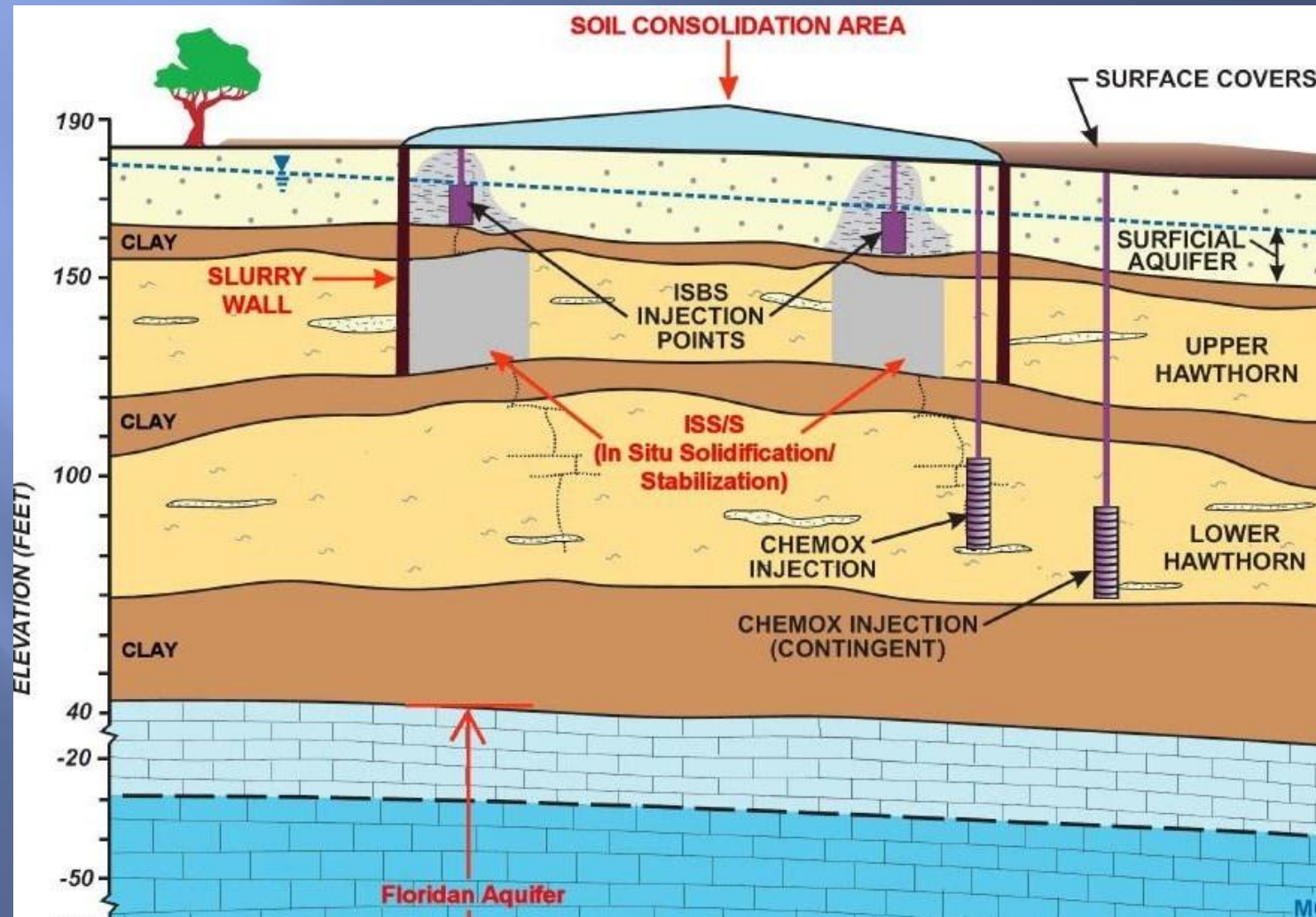
- Remedy selection
- Desired future uses

EPA has been deficient in following federal law and its own policy directives in this regard.

EPA's Proposed "Clean-up" Plan

- No removal of contaminants
- Dump additional contaminants onto site
- Cap and cover-up contaminants
- Turn site into hazardous waste landfill

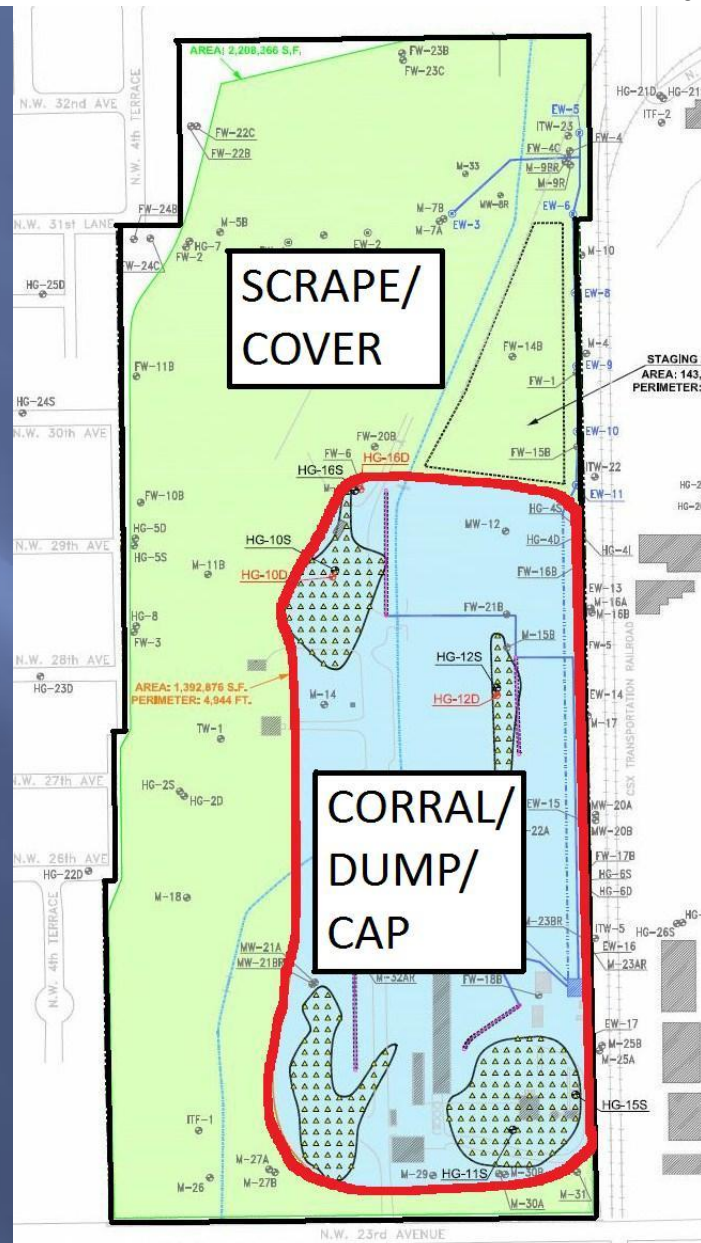
EPA's Primary Source Area Remedy



EPA's Surface Soils Remedy

Scrape, dump, cap, cover

Commercial/Industrial soil cleanup target levels



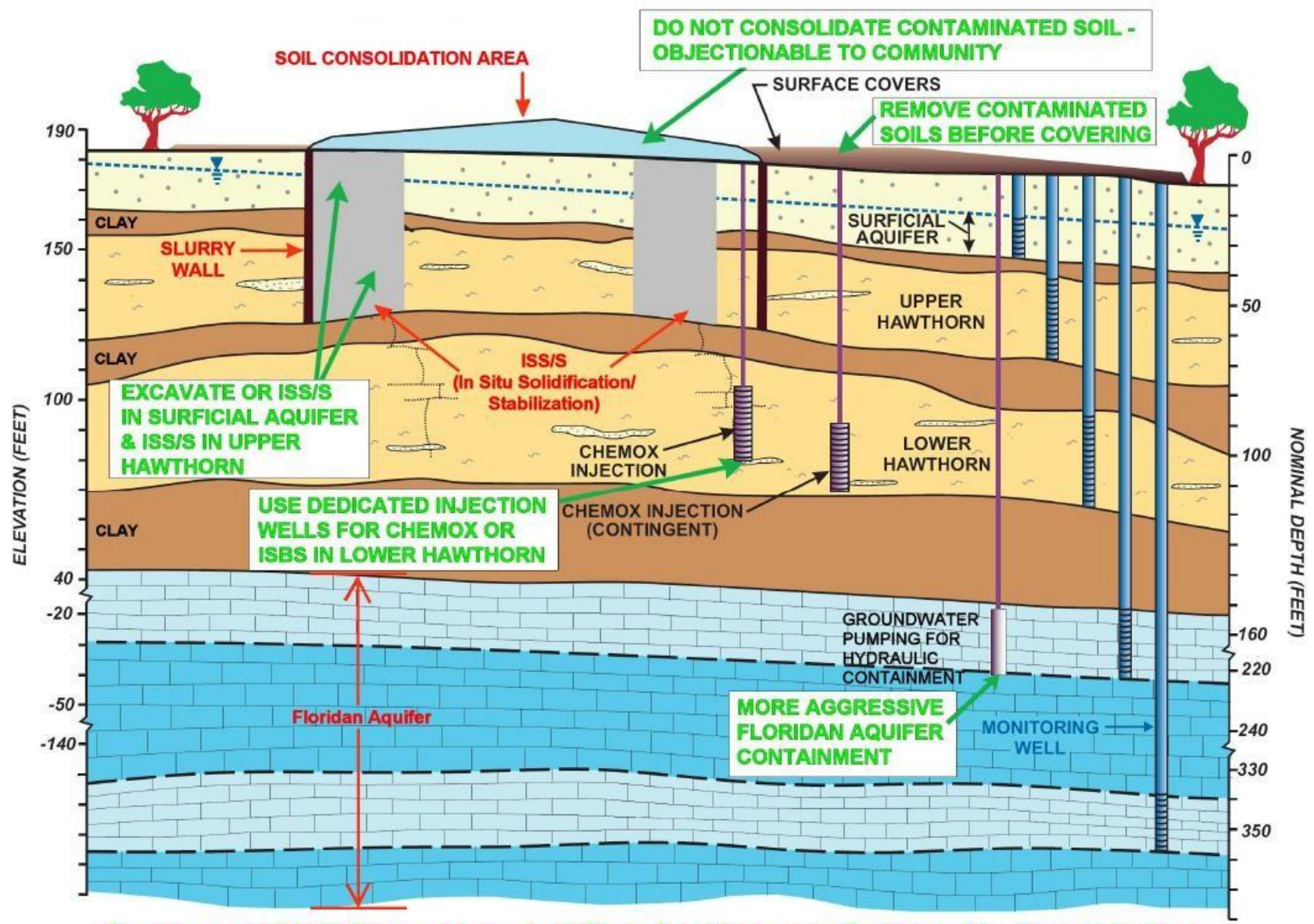
Proper Surface Soils Remedy

Residential soil cleanup target levels (SCTLs)

- Not Commercial/ Industrial
(typically 4 to 7 times higher concentrations
of contaminants)

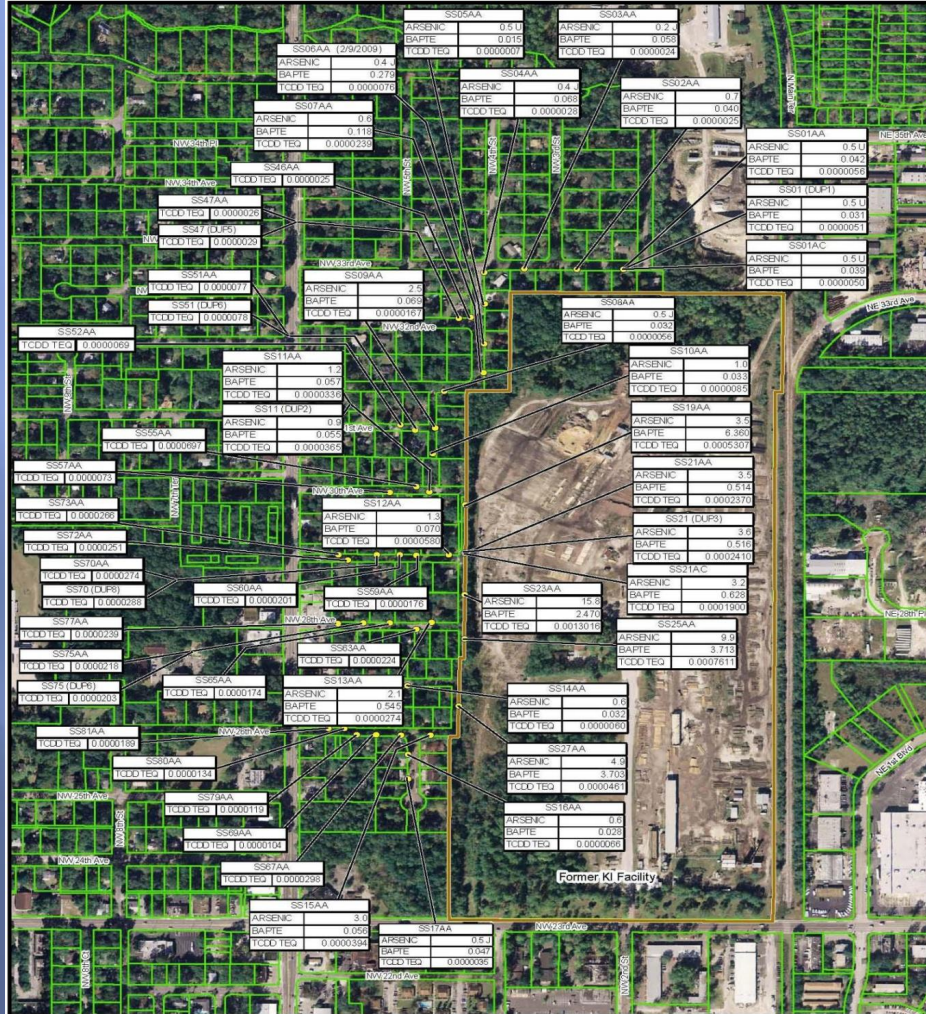
Soils cleaned thoroughly and deeply

- Not just surficial scrape/cover-up of remaining
contamination



Summary of LIT Recommended Plan for Koppers Gainesville Remediation

Off-site Soils Remedy



Off-Site Soil Sample Results

Cabot Carbon/Koppers
Superfund Site
Gainesville, Florida

Beazer East, Inc.
Pittsburgh, Pennsylvania

Notes & Sources

Aerial Imagery source: <http://nikos.alachua.fl.us>, 2005.
All soil samples collected from 0-0.5 ft below ground surface.

Location of Study Area

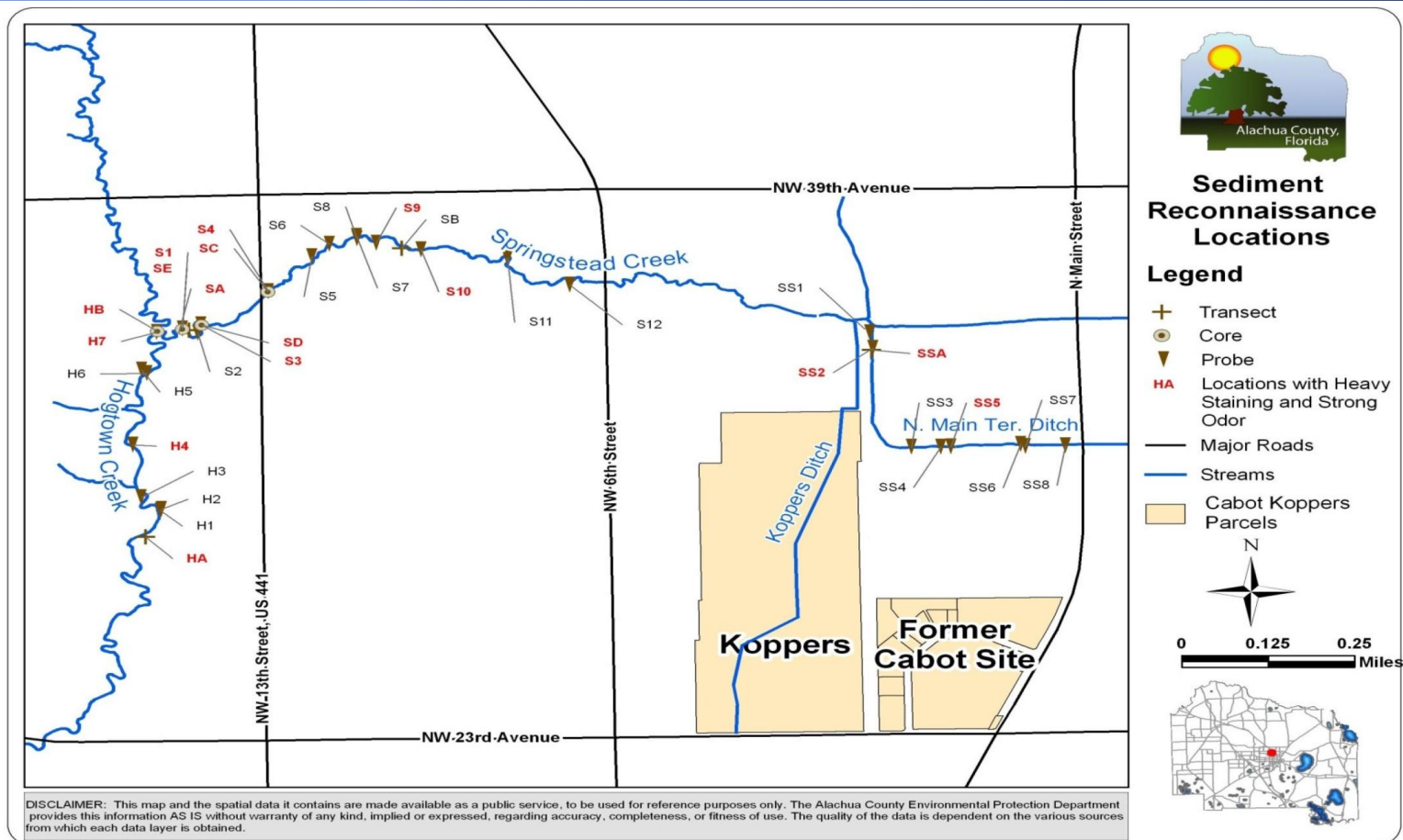


Legend

Sample Location	
Analyte	Concentration of analyte in mg/kg
U	Non-detect
J	Estimated value

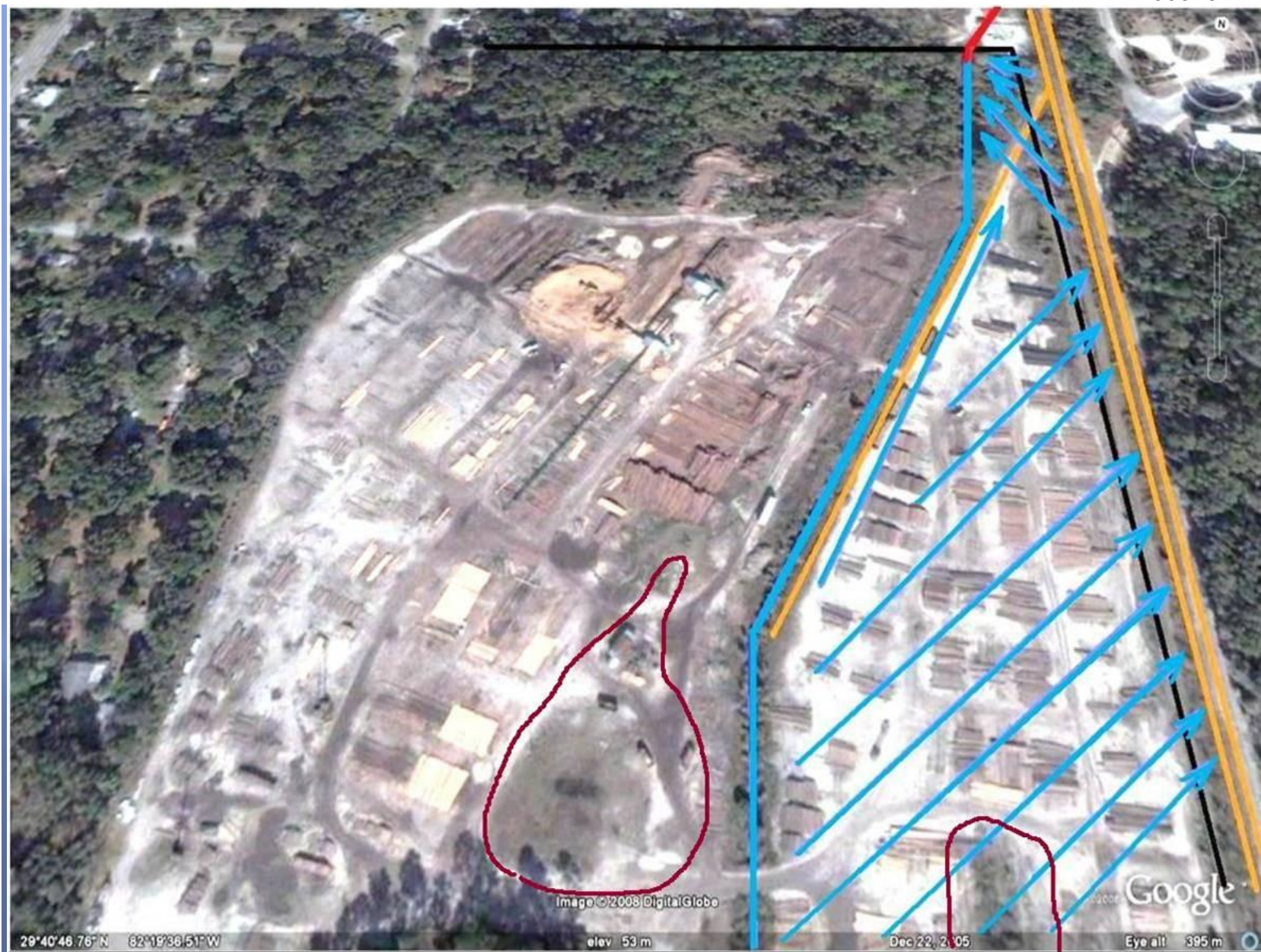
- Existing Soil Sampling Location
- Parcel Boundary
- Boundary of Former KI Facility

Creek Sediments/Stormwater Management



Beazers “Interim” Stormwater Permit Application





29°40'46.76" N 82°19'36.51" W

Image ©2008 DigitalGlobe

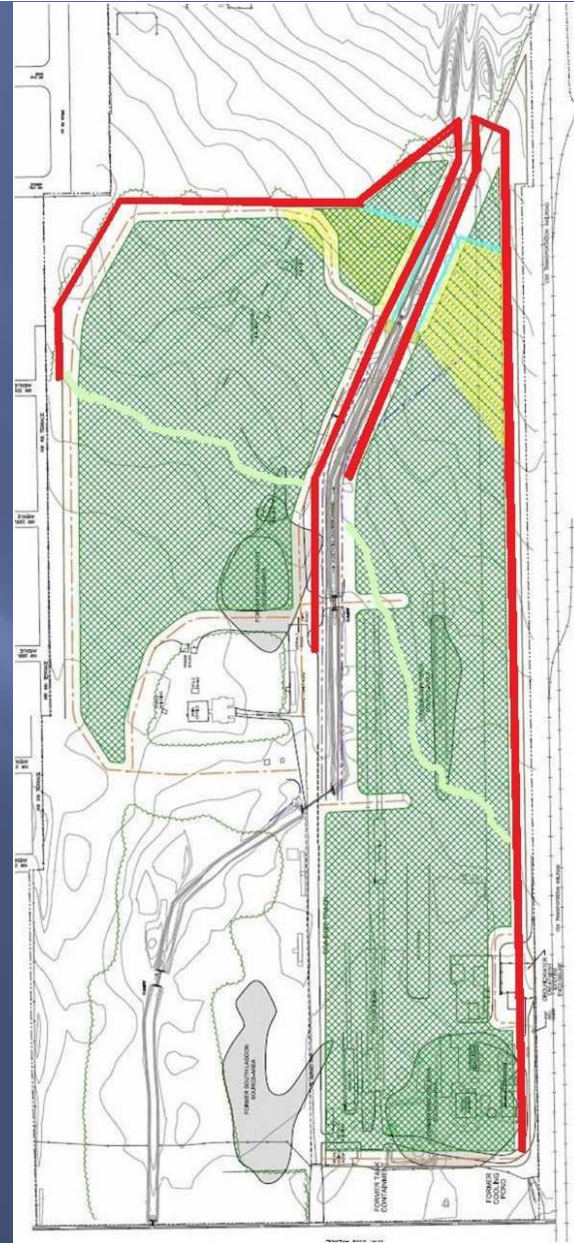
elev 53 m

Dec 22, 2005

Google

Eye alt 395 m

Enhanced “Interim” Stormwater Management Plan



The Role of the Community

“Superfund Community Involvement Handbook”

Chapter 2: The Role of Community Involvement in Superfund

“In CERCLA, Congress was clear about its intent for the Agency to provide every opportunity for residents of affected communities to become active participants in the process and to have a say in the decisions that affect their community.”

“Congress, in establishing the Superfund program, wanted the Agency to be guided by the people whose lives are impacted by Superfund sites.”

Future Use

- EPA's policy directives emphasize importance of community's desired future uses in remedy selection
- Re-use is tied to cleanup remedy/must be protective of anticipated future uses

The “Superfund Reuse Directive”

“The U.S. Environmental Protection Agency (EPA) believes that early community involvement, with a particular focus on the community’s desired future uses of property associated with the CERCLA site, should result in a more democratic decision-making process.”

National Contingency Plan at 40 CFR

“Ensure the public appropriate opportunities for involvement in a wide variety of site-related decisions, including site analysis and characterization, alternatives analysis, and selection of remedy.”

EPA's Deaf Ears

Gainesville City Commission Resolution (2008):

- Site should be cleaned to residential soil cleanup target levels

EPA's Proposed Plan:

“The selected cleanup goals are the Florida commercial/ industrial SCTLs for on-Site soils/sediments.”

Gainesville City Commission initiated land use change
(2010)

- Strong emphasis on desired future residential uses
on the site

EPA's Feasibility Study:

“On-Site residential exposure scenarios are not
applicable based on the expected commercial/
industrial and/or recreational use of the property.”

Final Comments

- Record of Decision should be put on hold.
- EPA needs to provide amended Feasibility Study.
- EPA should provide new Proposed Plan.

END