

Peter K

#001254

10/11/04

Good evening Madame Mayor and Commissioners. My name is Peter Rebmann and my presentation is one in the series being made tonight on behalf of the Northwest Gainesville Coalition of Homeowners Associations.

My presentation is going to focus on the question of whether or not it is safe to leave reclaimed asphalt pavement, commonly known as RAP, exposed to the elements.

On page 1 of the Water and Air Research document on the special use permit it states that RAP for this project will be stored in stockpiles and that the rainwater falling on these stockpiles will eventually reach the groundwater inside the wellfield protection zone. On page 7 of the same report they justify this practice by referring to a 1999 study by Brantley and Townsend of the University of Florida which concluded that RAP is not a hazardous waste and that it does not leach toxic chemicals when exposed to water.

We wish to submit a more recent report which reaches a very different conclusion regarding the leaching of toxic chemicals from RAP. This report, entitled Leaching of Organic Contaminants From Storage of Reclaimed Asphalt Pavement by Malin Norin and Ann-Margret Strömvall of the Chalmers University of Technology in Göteborg, Sweden, was published in the March 2004 issue of the journal Environmental Technology.

Since Environmental Technology is a refereed journal in which all articles are peer reviewed and since Dr. Strömvall, the lead researcher of the article, is an associate professor of environmental engineering at Chalmers University with at least ten peer reviewed publications to her credit we conclude that this report meets the standards for competent and substantial evidence.

In their report, Norin and Strömvall conclude that "the concentrations and the cumulative amounts of semi-volatile contaminants are high in the leachates from the temporary storage of RAP." More ominously they found that the major part of the contaminants were "unidentified organic compounds of unknown origin." Finally, their results indicate that the most probable sources of the contaminants in the leachate were from tires, unburned fuel, and vehicle exhaust.

I do not have time to discuss the technical details of the two reports. The point I want to make is that the scientific community has **not** concluded that rainwater leaching from RAP is free from dangerous contaminants. Where experts disagree, laypersons are well advised to be prudent.

Given that leachate from the RAP of this project will eventually end up in groundwater inside the wellfield protection zone, prudence and best management practices both dictate that rigorous methods should be employed to prevent as much contamination as possible from reaching that groundwater.

We therefore request that, as a condition of approval of this project, you require the petitioner to store all reclaimed asphalt pavement on this site in watertight bins or silos and that these bins or silos should remain tightly sealed at all times that they are not being actively loaded or unloaded.

Madame Mayor and Commissioners, this concludes my presentation. I thank you for your time and kind attention and I ask that a printed copy of my remarks and of the Norin-Strömvall report be made a part of the permanent record of these proceedings.