

Artist's Workbook for *Region4: Transformation Through Imagination*

What is the Problem?

For twenty-seven years, beginning in 1983, the citizens of Gainesville, Florida have been living in the shadow of one of the 100 most polluted sites in the nation—the Cabot-Koppers site, an EPA Superfund site so heavily polluted with toxic waste that it poses a serious threat to human health and the environment. The Cabot-Koppers site is within what the Environmental Protection Agency identifies as “Region 4, “ a large area that encompasses the Southeastern U.S. including the state of Florida. The title of our project—*Region4: Transformation Through Imagination*—refers to the designation by the EPA of the location of Cabot-Koppers Superfund site, a designation that we feel reflects the impersonalization and de-humanization of the affected community.

Who is Involved?

The exhibition, *Region4: Transformation Through Imagination*, is being organized by the Superfund Art Project (SAP) and sponsored by the Thomas Center Gallery in collaboration with Protect Gainesville Citizens, Inc. (PGC) and the City's Division of Cultural Affairs. Oversight of the exhibit and related programs is by oconnorartLLC, a Gainesville-based art consulting business. The exhibition and related programs are funded by a grant from the Florida Department of State, Division of Cultural Affairs and the Florida Arts Council.

Basic Information

What is Superfund?

Superfund is the name given to the environmental program established to address abandoned hazardous waste sites. It is also the name of the fund established by the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ([CERCLA statute](#), [CERCLA overview](#)). This law was enacted in the wake of the discovery of toxic waste dumps such as [Love Canal](#) and [Times Beach](#) in the 1970s. It allows the EPA to clean up such sites and to compel responsible parties to perform cleanups or reimburse the government for EPA-lead cleanups.

How Superfund Works

The [Superfund cleanup process](#) is complex. It involves the steps taken to assess sites, place them on the [National Priorities List](#), and establish and implement appropriate cleanup plans. This is the long-term cleanup process. In addition, the Agency has the authority to conduct [removal actions](#) where immediate action needs to be taken;

to [enforce](#) against potentially responsible parties;

to ensure [community involvement](#);

involve [states](#);

and [ensure long-term protectiveness](#)

The blueprint for these activities is the [National Oil and Hazardous Substances Pollution Contingency Plan \(NCP\)](#), a regulation applicable to all federal agencies involved in responding to hazardous substance releases.

Over the past 20+ years, USEPA located and analyzed tens of thousands of hazardous waste sites, protected people and the environment from contamination at the worst sites, and involved others in cleanup.

Who Implements Superfund

EPA's Office of Solid Waste and Emergency Response (OSWER) in Washington, D.C. oversees the Superfund program. The Office of Emergency Management within OSWER is responsible for short term responses conducted under the authority of Superfund. The Office of Superfund Remediation and Technology Innovation, and the Federal Facilities Response and Reuse Office, also within OSWER, have the lead for managing the long-term Superfund response program, the latter for responses involving Federal Facilities. In addition, OSWER manages the federal Brownfields program.

Regions

EPA's 10 Regional offices around the nation are responsible for implementing many of EPA's programs, including Superfund. For Superfund, EPA regions are the front line in responding to releases of hazardous substances and other emergencies.

Region 1--ME NH VT MA RI CT;Region 2--NY NJ PR VI;Region 3--PA DE DC MD VA WV;Region 4--KY TN NC SC MS AL GA FL;Region 5--MN WI IL MI IN OH;Region 6--NM TX OK AR LA;Region 7--NE KS IA MO;Region 8--MT ND WY SD UT CO ;Region 9--CA NV AZ HI;Region 10--WA OR ID AK
Regional Superfund ContactsRegional Public Liaisons
Partnerships

EPA's Superfund Program attempts to get interested parties and other stakeholders involved as much as possible, as early as possible.

Superfund Partners

For additional information on the Superfund program go to:
www.epa.gov/superfund

What is the Goal of Our Project?

Our goal is to organize an art exhibition that can “express the science and the emotions” in a way that will make the story come alive from the facts so that the audience will be able to understand the scientific data of the site as well as the concerns, hopes, beliefs and experiences of the people who live in the shadow of a Superfund site.

Using art to **express the science**, to **document the history**, and to **dramatize the emotions** of the effected community, we hope to personalize our Region4 site and **reclaim it for our community while demonstrating the power of art to heal and nourish.**

Recently, you may have read that the EPA has issued a document (Record of Decision) outlining the proposed remediation (clean-up) of the site to be undertaken by Beazer East, Inc. the “party of responsibility.” The ROD was reviewed by City and County officials as well as GRU and Protect Gainesville Citizens, Inc. (PGC).

There has been a long struggle on the part of local citizens to ensure that the clean-up is appropriate and effective. **The ROD was accepted by the City Commission in February 2011 and cleanup efforts are currently in progress.** Our exhibition will **celebrate** the clean-up effort while also **exploring the history of the site and what we can learn from the experience of dealing with a Superfund site in our midst.** And we will look to the **future** regarding the re-use of the site and how artists envision turning a liability into an asset.

Our goal for the exhibition is **not to confront, but to inform and explore.** We plan to offer strategies for **healing** the community and to reach the widest possible audience by **partnering** with community leaders, organizations and institutions, by targeting multiple venues for the traveling component of the project and by **promoting thought and conversation** through the use of interdisciplinary perspectives.

What is the Format of the Exhibit?

The *Region4: Transformation Through Imagination* exhibition will consist of 30 original art works by contemporary Florida artists that will **document the history** of the Cabot-Koppers Superfund site, **address the artist's interaction with the site** and their interpretations of the significance of the site in their own lives and in the life of our community, and **explore ideas for re-claiming the site** following remediation and for healing the physical and psychological traumas induced by the presence of the Superfund site.

The proposed exhibition addresses **four topics of concern**:

1. **documentation** (the history of the site and how it got that way)
2. **transformation** (the cleanup process)
3. **restoration** (restoring the site to ecological health and thus restoring the health of the larger community)
4. **commemoration** (a permanent exhibit/art work that will serve as a reminder of what happened and how the problem was addressed and rectified).

Through the exhibition and related programs the public will learn about the long struggle to remediate the site and how important this remediation is to the health and well-being of our community. **We seek closure and a positive outcome.**

What is the Exhibition Selection Process?

We will **invite 15 Gainesville artists** to participate in an exhibition that will be on display at the Thomas Center Gallery in **March/April 2012**. The selection of these "core" artists is based on their past interest in environmental issues as well as their known expertise.

All other artists in North Central Florida are also eligible to submit a proposal to the SAP committee for consideration. **Fifteen additional artists** will be selected to participate in the art exhibition.

Request for Proposals

A “request for proposals” will be posted in July 2011 soliciting proposals from 15 artists in the Gainesville area who are invited to participate in this unique event **and inviting other artists to send proposals for consideration.**

The proposal process will also be available on the Protect Gainesville Citizens website at www.protectgainesville.org and on the oconnorartLLC website at www.oconnorartLLC.com .

Proposals must be **postmarked or hand-delivered to the Thomas Center Gallery by Ocotober 15, 2011.**

Artist’s Workbook

To assist artists in preparing a proposal we have created a “workbook” that includes scientific information about the history of the site and the plans for remediation (clean-up). The basic concept is to use art to “express the science and the emotions” and to explore the physical and psychological conditions and the environmental issues associated with the Superfund site.

The **workbook information** is included at the end of this document. In addition, artists are invited to explore the information and archives that appear on the Protect Gainesville Citizens (PGC) website at www.protectgainesville.org.

Artist’s Workshop

To assist artists in preparing a proposal we will also hold an **artist’s workshop in early September. The date will be announced on the websites at the end of July.** The workshop will include:

1. A site visit to the City property adjacent to the Cabot-Koppers Superfund site
2. A workshop session at the Thomas Center where artists will be able to discuss their project with scientists who have reviewed the EPA ROD and are working on the remediation effort.

During the workshop, artists will have access to professional scientists so they can interact with them and discuss how they can incorporate the science images—graphs, maps, containment plans—into their art work.

The Selection Process

Artist's proposals will be evaluated by a committee of qualified individuals including members of the Superfund Art Project Board plus additional experts appointed by the SAP Board. In addition to the 15 "core" artists, 15 additional artists will be selected by the committee to exhibit their work in the exhibit.

Selections will be based on **artistic excellence, relevance to the goals of the project, effective communication of ideas and innovative responses to the problems of documentation, transformation, restoration or commemoration.**

Exhibition Catalogue

DCA grant funding will make it possible for us to print a substantial catalogue of the exhibition that will include reproductions of the artist's work and essays by art and science experts.

Related Programs

Plans are underway for several exhibition-related programs including lectures, a public forum, and screening of environmental films that will take place during the exhibition period.

Traveling Exhibition

Following the exhibition at the Thomas Center Gallery (March/April 2012), we plan to create **digital images** of the works in the exhibit and make them available to other Florida communities that have a Superfund site (there are 43 in the state). In this way we hope that Gainesville can serve as **a successful model** for other communities that are dealing with similar problems.

APPENDIX

- The EPA report on Superfund #FLD980709356 (the Cabot-Koppers Site)
<http://www.epa.gov/region4/waste/npl/nplfln/cabkopfl.htm>
- The Technical Assistance Grant (TAG) Report prepared by scientists working on the study of the remediation plans
Pages 18-21 below
- Five Data Points: Information on the Superfund Site by Kim Popejoy. Pages 9-17 below
- Orange Creek Basin Management Plan by the Orange Creek Basin Working Group
<http://protectgainesville.org/files/2011/08/OCBMAP.pdf>
- Two articles from the Gainesville Sun Archive
www.gainesville.com/article/20091025/ARTICLES/910251004
www.gainesville.com/article/20091024/OPINION03/910239979
- Murphree Wellfield document
<http://protectgainesville.org/files/2011/08/FieldStudy.pdf>
- 2 jpeg images of the Cabot-Koppers site
<http://protectgainesville.org/files/2011/08/OnR-5C.jpg>
<http://protectgainesville.org/files/2011/08/OnR-5Cb.jpg>
- National Atlas article on Re-using Superfund Sites
www.nationalatlas.gov/articles/environment/a_superfund.html
- EPA report on the Montrose, California Superfund site
<http://protectgainesville.org/files/2011/08/Montrose.pdf>
- Telephone conversation about the Wingate Superfund Site
<http://protectgainesville.org/files/2011/08/WingateSuperSite.pdf>

FIVE DATA POINTS

2010.08.08 Draft-Kim Popepoy

“Unless otherwise noted, all quotations are from the United States Environmental Protection Agency's Proposed Plan Fact Sheet-Final dated, July 2010.” Blue font are my words. I have started with the Five Data Points as being

- 1. Earth*
- 2. Wind*
- 3. Water*
- 4. Fire in the Belly [Human Ecological Risk]*
- 5. Bureaucratic Bungling.*

In this draft, I have mainly drawn from the USEPA's own words and added some narration to them. I am attaching some charts and maps, we still need aerial photos and specific numbers for contamination and chemical formulas for the various toxins.

I do want to get this out to every one to see if this is a path that we think will be helpful to artists in general and whether it provides a structure that can be made more sophisticated for some groups and simplified for others.

1. THE EARTH:

The dirt that we walk on, the soil we dig our hands into, the foundation upon which we build our homes and structures, the anchor and source of nutrients for growing our food, the sediment we track around with us and occasionally breathe and ingest; this is our earth.

“The Cabot Carbon/Koppers Superfund Site encompasses approximately 170 acres, bridging two properties in a commercial and residential area of the northern part of the Gainesville city limits, Alachua County, Florida. The Koppers portion of the site encompasses 86 of those 170 acres.”

For one hundred years, these sites have been used in ways that have produced large numbers of hazardous and toxic chemicals that for the majority of time were just dumped upon Mother Earth.

Sometimes they were gathered into ponds that had been excavated for that purpose. Sometimes they were just dripped onto the ground. Sometimes they were allowed to run off into Hogtown and Springstead creeks and sometimes they were buried underground.

“Over 350 soil borings and 1,000 soil samples have been collected and analyzed across the Site since 1984. Potential impacts to off-Site areas have been investigated and continue to be investigated west of the Site. An additional off-Site soil investigation is currently being conducted to completely delineate the extent of impact in other areas surrounding the Site.”

“The contaminants of concern (COCs) identified for soil and groundwater in the 1990 ROD include phenols (such as penta), polycyclic aromatic hydrocarbons (PAH), arsenic, and chromium. Creosote, the predominant chemical material historically used for wood treatment at the Site, consists mainly of PAHs and includes both potentially carcinogenic (pcPAH) and non-carcinogenic (ncPAH) compounds. The EPA and FDEP also required sampling and testing for polychlorinated dibenzo-p-dioxins and polychlorinated dibenzo furans (dioxins/furans) in soils. Based on the results of this sampling, dioxins/furans have also been identified as COCs for Site soil. Relatively low benzene, toluene, ethylbenzene, and xylenes (BTEX) concentrations also have been observed in soils and groundwater under the four identified source areas.”

“The origin of contaminants at the Site is linked directly to facility operations and historical waste management methods. Releases occurred when wood-treatment chemicals dripped onto the soil or were deposited in unlined lagoons. Soils above the water table contaminated with contaminants of concern (COCs) are a result of residual DNAPL in unsaturated pore space or contaminants that are adsorbed onto soil particles.” Contaminants of concern [COC] that “... drive the evaluation of human-health risk for direct soil exposure at the Site under current Site use... are dioxins, arsenic and PAH.”

What is being proposed as remedies for these toxins in our soil has been called the Protect Gainesville's Citizens, Inc., “A Cover Up, Not a Clean Up!” USEPA is proposing to cover approximately 60 acres of the site contamination with up to 2 feet of clean soil and for the worst of the poisons to push them into a huge pile of approximately 30 acres by 8-10 feet high then cover that with a tarp

and some clean dirt. If they decide it is warranted, they might add some more chemicals to the ground to 'stabilize' the other chemicals of concern.

“Surface grading and covers - This remedial component consists of re-grading much of the Site and using one or more types of surface covers to prevent potential direct exposure to surface soils.”

“Soil consolidation area with low-permeability cap/cover - This remedy component consists of placing select soils in a designated on-Site consolidation area within the area encircled by a subsurface barrier wall. The soil placed within the consolidation area includes surface soil that is removed during Site grading and soil that is derived from construction of other remedy components. A low-permeability cap/cover will be constructed over the consolidation...”

“On-Site ex-situ soil treatment - This remedy component includes on-Site treatment of soils from source area excavation and/or resulting from ex-situ solidification/ stabilization implementation. It is assumed that soil will be treated by solidification/stabilization, although other treatment options (e.g., chemical oxidation, thermal treatment, biological treatment) may be evaluated during final design.”

For the soils that are off the site and in the neighborhoods and woods that surround the Koppers site, the USEPA is proposing to dig up peoples poisonous yards and dump this contaminated soil onto the Koppers site. This will be done if the property owner agrees. If the property owner doesn't agree, then the USEPA will do nothing to that particular yard. If there are poisons off site that the USEPA cannot get to for one reason or another, then the government will create either physical barriers to the site so that no one can get to this part of our earth or, will make rules that govern into perpetuity what can be done on this patch of land.

“Range of options for off-Site soil for use on individual subparcels with consent of private property owners:

– Excavation and removal of impacted soil that exceeds cleanup goals based on present land use (transported and consolidated within capped areas on-Site).

– Engineering controls that prevent contact with impacted soil that exceeds cleanup goals based on present land use.

– Institutional controls to manage access and use of land/properties.”

“Soil sampling results on City right-of-ways (ROWs) have clearly confirmed the likelihood of soil contamination on residential properties west of Koppers at concentrations higher than the State of Florida soil cleanup target levels for unrestricted land use. DEP strongly recommends expeditious excavation and removal of offsite contaminated soils as the preferred remedy to address soil contamination on offsite residential properties. As previously noted by State and local agencies, the results of soil samples collected along the south and east Koppers facility boundaries indicate that soil contamination likely extends offsite in those directions at concentrations above State SCTLs applicable for unrestricted use. Recent onsite sampling of the "northern inactive area" has also shown significantly elevated concentrations of dioxin suggesting soil contaminant migration may have also occurred north of Koppers. We request that Beazer provide a scope of work and schedule outlining the proposed offsite sampling that will expedite contaminant delineation as well as design and remedial action to address the offsite soil contamination.” Kelsey Helton, Florida Department of Environmental Protection Memo to Scott Miller

2. Wind

Even though citizens and government personnel from city to county to state have regularly and frequently asked for the USEPA to require Beazer East, the responsible party, to monitor dust coming off the site, no measurements have yet been made.

“Other smaller isolated surface soil areas throughout the property show high concentrations of various contaminants that are not associated with any particular process area on the property. These minor locations of elevated contaminant concentrations are not identified as source areas, but as locations of contaminants that either migrated from source areas (i.e., by surface runoff, soil dust deposition, or other surface transport mechanism), or are isolated residuals from historic wood treating operations.”

“Past transport of COCs via dust likely caused the detections of Site COCs in off-Site surface soil west of the Site.”

3. Water

The waters that flow from the sky to earth, flow on top of the earth as runoff, flow directly under the top layers of soil as surficial waters and flow deep in the earth as the Floridan Aquifer form the blood of all life. As such, it carries the foods, chemicals and nutrients that sustain our lives. These waters are transportation for living as well as non-living elements of the ecosystem. These waters are what cool us and cleanse us, it is what we drink and is essential to bonding us to the interconnected web of existence. All of these waters are threatened by the contaminants of Koppers. The unmitigated flow of these waters both above and underground provide the most rapid and unseen means for spreading this poison throughout the community.

“Investigative work has been done in Hogtown and Springstead Creeks, north of the Koppers Site. These studies were done to support evaluation of possible impacts to ecological habitats and species in these surface water bodies. Since inputs to both Springstead and Hogtown Creek are attributable to releases from both the Koppers facility and the Cabot Carbon facility, cleanup will be performed jointly.”

“Groundwater impacts have resulted from: (a) percolation of contaminants in process water down to the water table; (b) dissolution of contaminants from DNAPL in the subsurface; and (c) leaching from soils as rainwater percolates through the unsaturated zone in areas with high concentrations of COCs.”

“The predominant PAH compound detected in groundwater at the Site is naphthalene. Naphthalene is used as the primary indicator compound to represent the presence and extent of COCs in Site groundwater due to its prevalence and very high mobility. Groundwater samples are analyzed for benzene, toluene, ethylbenzene and xylenes (BTEX), PAHs, phenols, arsenic, and chromium. Several of the wells near the source areas and near the eastern Site boundary have naphthalene concentrations greater than the Florida default groundwater cleanup target level (GCTL) of 14 µg/L. Concentrations of some other COCs (PCP, arsenic, benzene,

carbazole, dibenzofuran) also exceeded their default GCTLs and/or federal maximum contaminant levels (MCLs) in certain wells.”

“...one of these wells (a source-area monitoring well near the Former North Lagoon) currently has organic concentrations above state or federal drinking water standards. Naphthalene concentrations at this well have decreased substantially since July 2004.”

“Florida leachability criteria for soil are relevant and appropriate for protection of groundwater.”

“*Storm water rerouting and detention* – This remedy component will be implemented in concert with the designed surface grading and covers. Storm water controls will consist of: (a) grading and contouring the Site to direct runoff toward collection points; (b) installation of one or more detention/retention ponds; and (c) possible replacement of the existing Site storm water ditch with another ditch or with an engineered conveyance such as an underground concrete pipe (culvert).”

“*In-situ solidification/stabilization (ISS/S) of source areas* – This remedy component consists of applying additives, such as cement, lime, fly ash, or polymers, to bind with the soil particles to reduce the mobility of the contaminants.”

“*In-situ biogeochemical stabilization (ISBS) of source areas* – This remedy component consists of injecting a buffered solution of sodium permanganate and catalysts into the target zone...”

“*Manual DNAPL recovery* - This remedy component involves continuation of the current program of bi-weekly DNAPL bailing from Upper Hawthorn monitor wells...”

“*Chemical Oxidation (ChemOx)/ISBS using existing HG wells* - This remedy component involves use of existing HG monitor wells as treatment-injection points for either ChemOx or ISBS based on contaminant concentrations and pilot study results....ChemOx is used to chemically transform organic COCs into non-toxic or immobile substances.”

“Surface water and sediment in Hogtown and Springstead Creeks:

- On-site detention basin to mitigate on-going impacts
- Excavation and removal of impacted sediment in excess of the probable effects concentration (transport and consolidate on-site)

– Monitored natural recovery of remaining impacted sediment until concentrations reach threshold effects concentration or background levels
Upper Floridan Groundwater: UFA-2

- Hydraulic containment by groundwater extraction and treatment in areas where COCs exceed cleanup goals.
- Construction of additional extraction wells for the network, as necessary.
- MNA in areas where concentrations of COCs do not exceed cleanup goals (subject to demonstration of active natural attenuation processes).”

4. Fire in the Belly [Human/Ecological Risk]

The USEPA has done what they call a risk assessment to the overall health of humans from these contaminated sites. Initially, they were going to do their clean up based upon determining what was the minimum level of cleaning necessary to keep the cancer risks at less than or equal to 1 human death per million people. They have since changed their criteria and are no longer using a human-health risk-based assessment for determining clean up levels. Now they are just going to go on Florida Standard Clean up Target Levels. There is no consideration of the birds in the sky, the frogs on the ground, the fish in the waters or the pets in the yard when doing their risk-based assessments.

“The assessment shows that pcPAHs, arsenic, and dioxins/furans are the COCs that make the largest contribution to the overall potential excess lifetime cancer risk associated with the Site. Potential exposure to pentachlorophenol makes a small contribution to the total potential excess lifetime cancer risk.”

5. Bureaucratic Bungling:

The Koppers site has been under USEPA jurisdiction for over 25 years. They have conducted studies, issued Records of Decision and even executed a 'so-called' clean up plan for the Cabot/Carbon portion of the site. The inadequacies of this site management are now legendary. One of the most glaring and potentially harmful examples of this bungling is evidenced by the toxins that have been released from the Cabot/Carbon site since its cleanup.

“The proposed remedy is intended to be the final cleanup for the Cabot Carbon/Koppers Site. The preferred alternative identified in this Proposed Plan, or one of the other active measures considered in this plan, will protect public health, welfare, and the environment from actual or threatened releases of hazardous substances into the environment.”

“Potential ecological risks associated with sediment were also evaluated in 2009. The Agency has evaluated the 2010 ecological screening level risk assessment and its accompanying revisions and does not believe that it provides an adequate basis to select remedial goals for the Site.”

“Considerable uncertainty surrounds the derivation of clean-up goals for dioxins and furans, including the development of site-specific risk-based goals, and Florida’s default residential SCTL of 0.007 µg/kg. At present there is significant ongoing debate between and among researchers, different regulatory agencies, and the regulated community regarding the toxicity of dioxins/furans and whether meaningful human-health risks are posed by low concentrations of these contaminants, particularly with respect to concentrations in soils.”

“Off-Site soil characterization continues to the north, south, east, and west of the Site to completely delineate Site-related impacts and to expedite cleanup of off-Site areas. During the remedial design, an ambient air monitoring network will be installed at the Site.”

“...alternatives, developed and documented in the 2010 FS, must meet the threshold statutory requirements of protection of human health and the environment to address chemical-specific, location-specific, and action-specific Applicable or Relevant and Appropriate Requirements (ARARs).”

“Community acceptance of the preferred UFA alternative will be evaluated after the public comment period. The results of that evaluation will be part of the Responsive Summary in the ROD amendment for the Site.”

“EPA provides information to the community regarding Site cleanup through fact sheets, public meetings, local Site information repository, and the Administrative Record file. EPA and FDEP encourage the public to learn

more about the Cabot Carbon/Koppers Site and Superfund activities that have been conducted at the Site by visiting the Site information repositories listed on the front page of this Proposed Plan.”

“There is an unidentified source of significant groundwater contamination within the surficial aquifer upgradient (west) of HG-29S that is causing the contamination at HG-29S/29D. Such a source was apparently not contributing to significant surficial aquifer contamination around the HG-29S/29D well pair when surficial aquifer wells in the area were sampled during the period from 1987 until mid 1994... Note that in the surficial aquifer, there is about a 0.5-foot thick zone with a "strong burned wood odor with burned wood fragments and associated staining" from a depth of between 5 and 6 feet. Underlying this thin zone is an approximately 8.5-foot thick zone with a "moderate burned wood and wood distillate odor.””

MEMORANDUM: FROM: William N. O'Steen, Environmental Scientist Technical Services Section, Superfund Division. TO: Scott Miller, Remedial Project Manager Superfund Remedial Section C.

“State and local agencies including DEP, Department of Health (DOH) and Alachua County Environmental Protection Department (ACEPD) have recommended offsite sampling for many years.” Kelsey Helton, Florida Department of Environmental Protection Memo to Scott Miller

TAG Grant

Protect Gainesville's Citizens (PGC) has been awarded a Technical Assistance Grant (TAG) from the United States Environmental Protection Agency (EPA) in order to obtain the services of technical advisors to assist in improving the Gainesville community's understanding of the Superfund activities at the Cabot/Koppers Site (hereinafter referred to as the Site) and more importantly, to promote the most effective community participation in the remedy selection and implementation at the Site. At most Superfund sites, a remedial investigation/risk assessment is completed, followed by a feasibility study (FS) that provides the analysis sufficient to select a remedy that is protective of human health and the environment.

The Cabot/Koppers Site is more complex. The Site has been a Superfund site since 1984 which led to an initial record of decision (ROD) in 1990 to address soil and groundwater contamination. Cleanup activities for soil and groundwater occurred in the mid 1990s to include removal of contaminated sediments in the Northeast Lagoon, construction of the trench to intercept contaminated groundwater from the shallow aquifer, and installation and operation of a surficial groundwater pump/treat system. However, removal of contaminated soils on the Koppers property, as required in the 1990 ROD, was delayed when additional investigation identified unknown sources of dense nonaqueous phase liquid (DNAPLs) and dioxin-contaminated soils within the Koppers property. Since then, a number of additional studies, memoranda, groundwater monitoring reports, work plans and data reports have been prepared with the intent of leading to a revised feasibility study that supports the recommended remedies for soil and groundwater. To date, there is no current comprehensive document that provides the complete current data set and cohesive data analysis that has occurred since 1990.

It may be possible for a technical advisor to summarize the FS and proposed plan based on simplifying the executive summaries in these documents; however, this approach may not provide the clarity and understanding

of cleanup options the public needs to comment to EPA on the preferred cleanup remedy for the site. Rather, SEA's approach is to initially have meaningful participation by the public during the SEA's review of the FS and

supporting documents (e.g., onsite risk assessment, ongoing off-site risk assessment, etc.) and proposed plan, to ensure the public has a transparent understanding of the interrelatedness and completeness of these studies in

addressing the core issues of concern to the community.

Pat Cline, the lead technical advisor (TA), has been involved in reviewing several of the past and recent Site documents, with emphasis on the surface soil issues and risk assessment. In addition, she has participated in

meetings and discussions with the City/County/GRU technical team related to groundwater and subsurface remedies of the Site. In this capacity, she has played a key role in enabling the local government and city utility to

effectively participate in communications with EPA and FDEP as a result of her ability to translate key technical concerns in an understandable format. In addition, as a member of this community, she is committed to

supporting the efforts of the PGC and the public to enable effective community involvement that can influence the ultimate cleanup outcome of the Site through the application of her outstanding risk communication skills.

The Record of Decision (ROD) is the EPA decision document that describes the remedy. It was prepared by EPA after consideration of stakeholder input following publication of the proposed cleanup plan.

The plan summarizes

the alternatives evaluated in the FS, and the documents/data supporting the evaluation and selection of the preferred remedy.

Community input was critical during the evaluation period since the feedback was not only required by Superfund regulations, but more important, effective public comment can influence the final remedy selection process. A critical time for the community to engage in a meaningful way was during the comment period for the proposed plan.

Therefore, assisting the community in understanding the site conditions/risks, potential cleanup options and the impact on the future use of the site was a priority prior to the issuance of the final ROD; this effort is reflected in Tasks 1-3 of the RFP. Tasks 4 and 5 represent technical advisory activities associated with post ROD decisions with activities focusing on oversight and monitoring of the remediation design to ensure consistency with the ROD, as well as, remedy implementation to verify that the remedial action objectives are met.

Team Members Role

Dr. Pat Cline Lead Technical Advisor/ Project Director. Breadth of experience dealing with contaminated sites including chemistry, chemical fate, risk assessment, site knowledge, review of relocation information.

Claire Marcussen Project Coordinator - Risk assessment issues, Technical review, project delivery

Dr. Jerry Steinberg, P.E. Project Engineer. Support particularly on review of design documents and remedy implementation oversight.

Dr. William Zegel, P.E. Technical Lead – Air. Support for Air Impact Issues/questions

Charles Fellows Technical Support - Chemistry and Ecological risk. Support as needed for review of work plans, data, and contaminated sediment issues.

James Hirsch, P.G. Technical Support - hydrogeology . Support on review of groundwater issues

Dr. Elmer Akin Technical Support – Toxicology/Public Health. Support particularly for more in depth understanding of chemicals (specifically dioxins) and EPA Region 4 risk management decision process.