COMMUNITY INVOLVEMENT PLAN

KOPPERS SUPERFUND SITE
EPA ID FLD980709356
GAINESVILLE, ALACHUA COUNTY, FLORIDA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

May 2011
REVISION

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY'S
SUPERFUND COMMUNITY INVOLVEMENT PROGRAM IS COMMITTED
TO PROMOTING COMMUNICATION BETWEEN CITIZENS AND THE AGENCY.

ACTIVE PUBLIC INVOLVEMENT IS CRUCIAL TO THE SUCCESS OF ANY PUBLIC PROJECT.

EPA'S COMMUNITY INVOLVEMENT ACTIVITIES AT THE
KOPPERS SUPERFUND SITE
ARE DESIGNED TO

INFORM THE PUBLIC OF THE NATURE OF THE ENVIRONMENTAL ISSUES ASSOCIATED WITH THE SITE,

INVOLVE THE PUBLIC IN THE DECISION-MAKING PROCESS THAT WILL AFFECT THEM,

INVOLVE THE PUBLIC IN THE RESPONSES UNDER CONSIDERATION TO REMEDY THESE ISSUES, AND

INFORM THE PUBLIC OF THE PROGRESS BEING MADE TO IMPLEMENT THE REMEDY.

IN RESPONSE TO THE COMMUNITY, EPA WILL REVIEW THIS COMMUNITY INVOLVEMENT PLAN (CIP) SIX MONTHS AFTER THE RELEASE DATE AND DETERMINE IF A REVISION IS NECESSARY.

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May 2011 Revisions: ROD checked as completed; February 2, 2011 date added to checklist for Responsiveness Summary (as part of ROD) issued via Press Release and Web Site; May 2011 dated added as 6-month update for CIP; and Appendix L added to show Public Involvement and Outreach activities.

Section 1.0
Overview of the Community Involvement Plan

The United States Environmental Protection Agency (EPA) developed the Community Involvement Plan (CIP) to serve as a framework for community involvement and outreach efforts associated with the Koppers Superfund Site (the Site). The CIP addresses the relationship between the Site, the community, and EPA; provides a background of the community; presents EPA's community involvement program; and provides a listing of resources. The goals of the CIP are to inform the public of planned and ongoing site activities; maintain open communication about site remediation; ensure that former concerns are acknowledged and addressed; provide interested parties with useful information; provide citizens with opportunities to comment on and be involved in technical decisions; and encourage and assist local citizens in providing input to agency decisions that will have long-term effects on the community. Information discussed during community interviews and Site documents are both essential elements in developing the CIP. The Draft CIP was submitted and made available to the public for public comment on August 16, 2010. Comments from the public were reviewed by EPA and were considered for the revision of the Draft CIP. The modified Draft CIP was published on October 1, 2010.

The CIP is revised as community concern warrants or at minimum, every three years until site activities have been concluded. The revision process includes conducting additional community interviews, updating mailing lists, investigating the designated repository, and updating the contacts and resources provided in the Appendices of the CIP. The purpose of the revision process is to ensure that both previous and current needs and expectations specified by the community are acknowledged.

Section 2.0
Capsule Site Description

2.1 Site Background

The Site covers approximately 140 acres which bridge two properties: the Koppers Corporation (Koppers) and Cabot Carbon Corporation (Cabot); each of which presents a unique challenge to the Site's proposed remedial actions. The Site is located in the northern portion of the City of Gainesville, Alachua County, Florida. Single family and multiple family residential properties are located to the immediate west of the Site and commercial facilities border the southern and eastern portions of the Site along Northwest 23rd Avenue and North Main Street, of which the Stephen Foster Neighborhood is the closest to the Site.

Wood-treating operations were conducted on the Site, which is currently owned by Beazer East, since the early 1900s. Poor waste handling practices adopted during these operations resulted in contaminated groundwater, soil and possibly off-site surface water. The contaminants of concern identified as Site-related include arsenic polycyclic aromatic hydrocarbons (PAHs), dioxin, and creosote compounds. Table 2.1, Identified Site Contaminants of Concern, presents a thorough list of the contaminants associated with the Site activities. Two potentially responsible parties (PRPs) are funding the cleanup, Beazer East, Incorporated (Beazer) is the PRP for Koppers and Cabot is the PRP for the remainder of the Site.

Table 2.1 Identified Site Contaminants of Concern

CONTAMINANT	IDENTIFIED MEDIA	CONTAMINANT	IDENTIFIED MEDIA
1-METHYLNAPHTHALENE	GW*	COPPER	SOIL
2,4-DIMETHYLPHENOL	GW, SOIL, SW**	DIBENZO(A,H) ANTHRACENE	SOIL
2,4-DINITROTOLUENE	SOIL	DIBENZOFURAN	GW
2-CHLORONAPHTHALENE	SOIL	ETHANOL	GW
ACENAPHTHENE	GW, SOIL, SW	ETHYLBENZENE	GW
ACENAPHTHYLENE	GW, SOIL	FLUORANTHENE	GW, SOIL
ANTHRACENE	GW, SOIL	FLUORENE	GW, SOIL, SW
ARSENIC	GW, SOIL	INDENE	GW, SW
BENZENE	GW	INDENO(1,2,3-CD)PYRENE	SOIL
BENZO(B)FLUORANTHENE	GW, SOIL	NAPHTHALENE	GW, SOIL, SW
BENZO(GHI)PERYLENE	SOIL	PAH	SOIL
BENZO(K)FLUORANTHENE	GW, SOIL	PAHs (POLYCYCLIC AROMATIC HYDROCARBONS)	GW, SOIL
BENZO[A]ANTHRACENE	GW, SOIL	PENTACHLOROPHENOL	GW, SOIL
BENZO[A]FLUORANTHENE	GW	PHENANTHRENE	GW, SOIL
BENZO[A]PYRENE	SOIL	PHENOL	GW, SOIL, SW
BIS(2-ETHYLHEXYL)PHTHALATE	GW, SOIL, SW	PYRENE	GW, SOIL
CAMPHOR	GW, SOIL, SW	VOC	GW, SW
CARBAZOLE	GW	* GW represents Ground Water **SW represents Surface Water	
CHROMIUM	GW, SOIL, SW		
CHRYSENE	SOIL		

2.2 Site Investigations and Cleanup Activities

Koppers Portion of the Site

The Koppers site is a former wood treating facility located on Northwest 23rd Avenue and comprises the western portion of the Site (Figure 2.1, Site Layout). It measures approximately 90 acres in size. Wood treating activities were conducted on this portion of the Site since the early 1900s. Specific by-products detected on the Koppers portion of the Site include creosote, pentachlorophenol, and copper-chromium-arsenic (CCA). Two wastewater ponds, a former cooling pond/process area, and a drip track area were identified in this portion of the Site. Investigations performed by Koppers in the 1980s revealed soil and groundwater contamination on-site.

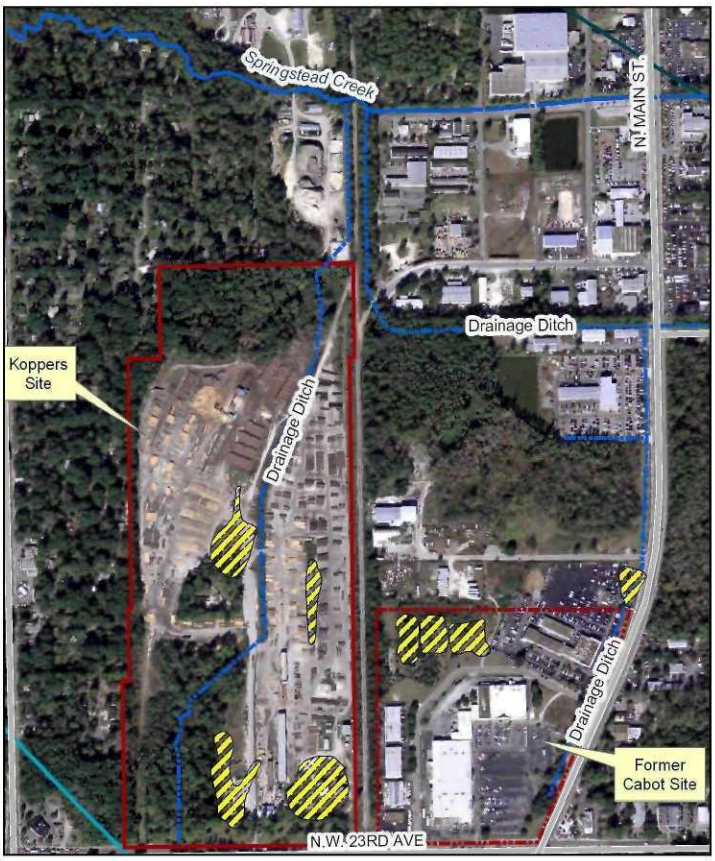


Figure 2.1 Site Layout

In 1985, the Department of Transportation (DOT) proposed to widen a portion of North Main Street, adjacent to the Koppers site, estimating that 4,800 cubic yards of contaminated muck were unsuitable for roadbed material and needed to be removed. The Florida Department of Environmental Regulation (FDER, now FDEP) identified feasible alternatives for disposal of the muck in its March 1986, "Assessment of Management Alternatives for North Main Street Muck – Gainesville, Florida."

In December 2009, Koppers announced its agreement for the sale and transfer of the property and buildings to Beazer.

Cabot Portion of the Site

The Cabot site is located in Gainesville, Florida near the intersection of Northwest 23rd Avenue and North Main Street in Section 29, Township 09S, Range 20E. Cabot served as a facility for the destructive distillation of pine stumps and existed on the 49 acres site from 1945 to 1965. During Cabot's operation, approximately 6,000 gallons of crude wood oil and pitch were generated daily. Process wastewater containing residual pine tar was discharged to unlined surface impoundments, and the accumulated tar was periodically scraped-out and sold. The property was subsequently sold to a local developer who drained the ponds and allowed phenolic contents to flow off-site through an adjacent 50 acre wetland and into a storm water ditch

connecting with Springstead and Hogtown Creeks. Hogtown Creek traverses through the City of Gainesville and terminates at Haile Sink, which is approximately 14 miles away.

Car lot located on the former Cabot site

Cabot was sold to another developer in 1967. As a part of the process to commercialize the area where the Site was located, the product lagoons were breeched and as a result, pine tars and oils were discharged to the surrounding wetlands and creek. The remaining lagoon sludge was mixed with site soils. Later, a shopping center, car dealership, and a series of smaller stores and businesses were built on the site and storm water ponds were constructed on top of the former lagoons.

Shopping center located on the former Cabot site

Malodorous leachate appeared in the Main Street ditch which initiated community concerns. Groundwater samples were collected where exceedances in wood-preserving related contaminants were detected. As a means to quickly address the exceedances, a trench was installed along Main Street as well as partial excavation of the northeast lagoon.

A complaint against Cabot and Mr. Raymond Tassinari was filed by FDER in July 1983 for violation of Florida Statutes and FDER regulations. In June 1984, judgment was ruled in the favor of Mr. Tassinari. Through this ruling, Mr. Tassinari was offered cost recovery. However, implementation of the ruled cost recovery would not be conducted until completion of the Remedial Investigation/Feasibility Study (RI/FS). In 1995, FDEP completed cost recovery against the responsible parties, Beazer and Cabot.

Planning

In December 1984, FDER entered into a Superfund Cooperative Agreement with EPA to conduct a RI/FS. In April 1987, upon the completion of the draft Remedial Investigation (RI) report, FDER held an informational meeting in Gainesville to present the results and answer questions discussed in the draft RI/FS. The final RI report was received in June 1987.

In November 1987, the EPA-FDER Cooperative Agreement expired resulting in EPA taking the lead management role to the Site's remedial action. As a part of this lead, a Consent Order was entered with EPA and the PRPs, Cabot and Beazer. The final RI Addendum was issued in November 1989 which confirmed that elevated levels of site-related contaminants were detected in the groundwater (Koppers and Cabot), soils (Koppers), and sediments located in the North Main Street ditch and Springstead Creek. The Risk Assessment which concluded that

contaminant levels did not pose a health risk under current industrial/commercial land use practices and final Feasibility Study (FS) were approved in February and June 1990, respectively.

In August 1990, the EPA signed the Record of Decision (ROD) documenting the selected Site remedy for the Site. The remedy involved soil washing, bioremediation, and solidification/ stabilization of contaminated soils identified on the Koppers site; and surficial aquifer groundwater recovery at both the Koppers and Cabot facilities, with treatment prior to discharge to the local publicly owned treatment works (POTW). Soil cleanup criteria were selected based on future residential use of the Site and the protection of groundwater. Groundwater cleanup goals were health-based and assumed potential use as a drinking water source.

In March 1991, Cabot signed a Consent Order with EPA agreeing to perform remedial design and cleanup. Beazer agreed to perform remedial design and cleanup at the Koppers site in response to the EPA's administrative unilateral order. Cabot developed a remedial design describing the means of addressing the identified exceedances in both the soil and groundwater media which included a groundwater interceptor. The Cabot Groundwater Remedial Design was approved in December 1993.

Construction Studies Conducted by Cabot

Construction of the Cabot groundwater interceptor trench began in January 1995 following the completion of the widening of North Main Street adjacent to the Site. Contaminated soil located beneath North Main Street was excavated and treated off-site during DOT's road widening activities. Installation of the Cabot groundwater recovery system was completed in May 1995. Operation and Maintenance (O&M) of the surficial aquifer groundwater remediation system is ongoing. Cabot performed additional field work in the former clock tower area where three Floridan aquifer wells originally utilized during the former Cabot operations were plugged and abandoned in 2000.

Construction Studies Conducted by Beazer

Beazer completed a groundwater and soil treatability study and a groundwater pretreatment design in September 1993. Subsequently, construction of the groundwater recovery and pretreatment system was completed in November 1994. Operation of the Koppers groundwater recovery and pretreatment system is ongoing. Beazer conducted a preliminary evaluation of the existing surficial groundwater remedial system in December 2006 which was followed by more widespread sampling of surficial aquifer monitoring wells in 2007. Based on these results, Beazer implemented a surficial aquifer Interim Remedial Measure in May 2009 with modifications to the existing Koppers system. These modifications would increase the volume of contaminated groundwater removed in the on-site source areas and reduce the vertical movement of contaminated groundwater deeper into the aquifer.

Initial design sampling for the 1990 selected Superfund remedy indicated that a much larger volume of soil contamination might exist at Koppers along with dense non-aqueous phase liquid (DNAPL) contamination below the water table. Additional DNAPL assessment and re-

evaluation of the Site remedy was conducted and reported by Beazer in the September 1999 Revised Supplemental FS. EPA provided a separate FS Addendum with further evaluation of cleanup alternatives in April 2001. In response to the approved FS, EPA held a public meeting in May 2001 to present the proposed plan for an amended soil remedy. The proposed remedy consisted of an impermeable cap and underground slurry wall to contain contaminated soil and the underlying DNAPL creosote contamination in the surficial aquifer. The Gainesville Commission formally opposed the proposed containment remedy, citing concerns that the underlying clays were not adequate to prevent contaminant migration into the underlying Hawthorn formation and Floridan aquifer. FDEP expressed similar concerns and also indicated that off-site soil sampling should be completed to determine if site-related contamination including dioxin was present in the adjacent neighborhood.

As instructed by the EPA, Beazer conducted additional field work at the Koppers site to determine the continuity of the underlying Hawthorn clays, the extent of contamination, and the feasibility of the proposed containment remedy. Assessment activities from 2001 to present included: a) installation and monitoring of additional on-site wells in the shallow, intermediate and deep Hawthorn and upper Floridan Aquifer; b) DNAPL assessment including coring in or near the four on-site source areas; c) completion of a private well survey and sampling of off-site private potable wells west and north of the site; d) installation of additional off site Hawthorn monitoring wells east and west of the Koppers property; e) additional on-site soil sampling; and f) off-site soil sampling west of the Koppers facility. There are currently 38 Hawthorn and 33 Floridan Aquifer monitoring wells including 19 multi-level Floridan wells and four off-site "sentinel" Floridan wells at the Koppers site. Installation of additional Floridan monitoring wells is currently underway.

Conclusions from Studies

Groundwater

Data presented in the September 2002, August 2003, and September 2004 Field Investigation Reports, the July 2006 and October 2007 Floridan Aquifer Well Installations reports, the March 2008 Supplemental Hawthorn Group Investigation report, and subsequent ongoing groundwater monitoring results have confirmed that contaminants including phenolic compounds and creosote related compounds including PAHs and naphthalene have migrated from the surficial aquifer into the underlying Hawthorn formation and upper Floridan aquifer, at depths up to approximately 200 feet below land surface

Stormwater

Monitoring by Koppers of on-site storm water has confirmed exceedances of the "benchmark criteria" in the DEP storm water permit for arsenic and copper. A comparison to surface water standards indicates that arsenic is also above the FDEP surface water standard in on-site storm water. The on-site Koppers ditch conveys storm water off-site and ultimately to Springstead Creek. Federal and State regulations require the operating facility to comply with waste management protocols designed to prevent contaminant releases. Excavation of contaminated sediments in the on-site storm water ditch was completed by the Koppers facility in 2009 in an effort to address the current general storm water permit exceedances. Koppers submitted an application for an individual FDEP storm water permit which would require monitoring of

facility specific constituents to determine compliance with storm water regulations and identify any necessary subsequent corrective actions.

Soil

Beazer submitted an evaluation of possible interim actions, including an interim soil removal, to address surficial contaminant sources. Additional on-site soil sampling results were reported in October 2007 to support an update of the risk assessment and soil cleanup criteria, as well as the selection of a final soil/source remedy. The results depicted widespread on-site dioxin contamination in soils above State industrial use criteria as well as arsenic and some PAHs. FDEP and local agencies recommended off-site soil sampling to determine the horizontal extent of contamination. In response to the recommendation, off-site soil sampling in a City easement and Right of Ways (ROWs) in the residential neighborhood west of Koppers was initially conducted in early 2009.

Additional sampling is underway to determine the off-site extent of the contamination west of the facility. Results to date indicate that the top six inches of soil located in ROW samples up to 300 feet west of the site contain dioxin, arsenic and carcinogenic PAHs at concentrations above the State cleanup target levels for unrestricted residential use. Early events in the chronology of the site history are depicted in Table 2.2.

Table 2.2 Site History

Time Period	Event
1989	Site was included on the National Priorities List
	Health Assessment conducted by the State of Florida's FDEP
1990	Remedial Action plans confirmed
1995	Risk Assessment conducted by FDOH
2004	Groundwater Transport and Flow Modeling Work Plan submitted
2007	Five Year Review and Off-site Sampling Plan
2008	Interceptor Trench Investigation and Feasibility Study

Current Activities

Additional sampling and remediation is on-going for the Koppers site. On July 15, 2010, EPA released a Proposed Plan for a site-wide cleanup which addresses on and off-site soils/sediments, surface water, and groundwater. Appendix I, Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010, provides a detailed discussion surrounding the proposed cleanup activities for the Site.

Table 2.3 Superfund Cleanup Process

Event	Complete?	Description
PA/SI	☑	Preliminary Assessment/Site Inspection Investigations of site conditions. If the release of hazardous substances requires immediate or short-term response actions, these are addressed under the Emergency Response program of Superfund.
NPL Listing	☑	National Priority List (NPL) Site Listing Process A list of the most serious sites identified for possible long-term cleanup.
RI/FS	☑	Remedial Investigation/Feasibility Study (RI/FS) Determines the nature and extent of contamination. Assesses the treatability of site contamination and evaluates the potential performance and cost of treatment technologies.
ROD	☑	ROD Explains which cleanup alternatives will be used at NPL sites. When remedies exceed 25 million, they are reviewed by the National Remedy Review Board.
RD/RA		Remedial Design/Remedial Action (RD/RA) Preparation and implementation of plans and specifications for applying site remedies. The bulk of the cleanup usually occurs during this phase. All new fund-financed remedies are reviewed by the National Priorities Panel.
Construction Completion		Construction Completion Identifies completion of physical cleanup construction, although this does not necessarily indicate whether final cleanup levels have been achieved.
Post Construction Completion		Post Construction Completion Ensures that Superfund response actions provide for the long-term protection of human health and the environment. Included here are Long-Term Response Actions (LTRA), Operation and Maintenance, Institutional Controls, Five-Year Reviews, Remedy Optimization.
NPL Delete		NPL Deletion Removes a site from the NPL once all response actions are complete and all cleanup goals have been achieved.
Reuse		Site Reuse/Redevelopment Information on how the Superfund program is working with communities and other partners to return hazardous waste sites to safe and productive use without adversely affecting the remedy.

Section 3.0
Community Background

3.1 Community Profile

Gainesville is the largest city and county seat of Alachua County and serves as the cultural, educational, and commercial center for the North Central Florida Region. The City of Gainesville provides a full range of municipal services, including police and fire protection; comprehensive land use planning and zoning services; code enforcement and neighborhood improvement; streets and drainage construction and maintenance; traffic engineering services; refuse and recycling services through a franchised operator; recreation and parks; cultural and nature services; and necessary administrative services to support these activities. Additionally, the City of Gainesville owns a regional transit system, a municipal airport, a 72-par championship golf course, and a utility.

Photograph depicting the protests sponsored by the community

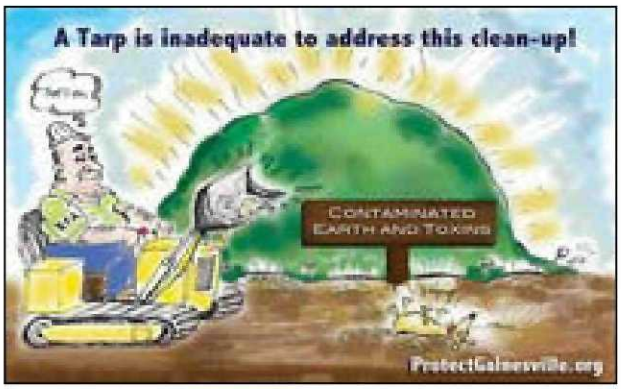
Gainesville is home to Florida's largest and oldest university and is one of the state's centers of education, medicine, cultural events, and athletics. The University of Florida and Shands Hospital at the University of Florida are the leading employers in Gainesville and provide jobs for many residents of surrounding counties. Known for its preservation of historic buildings and the beauty of its natural surroundings, Gainesville's numerous parks, museums and lakes provide entertainment to thousands of visitors. Because of its beautiful landscape and urban "forest", Gainesville is one of the most attractive cities in Florida. Santa Fe College also provides extensive education to the community.

Implementation of community awareness has been a top priority for the City of Gainesville through initiatives such as Dismantling Racism which focus on race and race relationships in the City of Gainesville, Florida.

The City of Gainesville has a Council/Manager form of government which means that the Mayor and City Commission make policy decisions; and the staff, led by the City Manager, implements these decisions.

3.2 History of Community Involvement

Community involvement has been established by EPA since the discovery of the Site. Several public meetings were held to discuss the status of the Site's remedial action over the period of the Site's existence. Upon the Site's inclusion to the National Priority's List (NPL) in August 1983, public awareness and education were offered to the affected community. The first form of education provided to the community was a health assessment which was conducted by Agency for Toxic Substances and Disease Registry (ATSDR) in April 1989 for the Site. A group of public meetings were facilitated by EPA for the community in regards to the remedial action for the Site from 1989 through 1990. The purpose of these meetings is to educate the community on the remedial action and the process that the remedial action will take. In August and September 1990 a formal public comment period for the RI/FS was held.



A depiction of the community's perception of the remedial action

At the conclusion of the remedial action, several meetings surrounding the five year review status of the Site were held to discuss the efficiency of the cleanup activities. Following the implementation of the remedial action, the community was educated on the purpose and process of selecting a Technical Assistance Grant (TAG); future reuse of the Site as well as the risk assessment of the off-site soils.

The community has played an active role in presenting their concerns regarding the remedial action to the public by protesting in front of the Koppers plant prior to its closure as well as facilitating and hosting their own individual group meetings. Media attention has played an integral part in educating the community on the Site-related activities. On April 20, 2010, seven Gainesville residents filed a lawsuit against Beazer Koppers Incorporated, Beazer, and the Boston-based Cabot Corporation for $500 million which will in turn, support the analysis and cleanup of the contaminants of concern at those properties that are presumably contaminated.

3.3 Key Community Concerns

The community concerns discussed in this section of the CIP are divided into two parts; former and current. The former community concerns are those that were documented ***prior*** to the preparation and implementation of the off-site remedial action proposed plan meeting held on August 5, 2010.

EPA conducted community interviews with local residents on July 8, 2010 to discuss the modified remedial action issued for the Site after which, a public meeting facilitated by EPA was scheduled. The major concerns highlighted during the interviews involved the need for more efficient communication among the PRP, EPA, and the community as well as the determination of the extent of contamination detected off-site.

3.3.1 Former Community Concerns

Former community concerns include the risk assessment conducted for the groundwater and surface water media. The community felt uncertain with the selected remedial design as there was not a thorough design proposed. Community concerns involved the following:

- Dust suppression and air particulate gauging;
- Overall remedial action and its efficiency;
- Risk assessment which determined the remedial action issued for the cleanup;
- Precaution to ensure no further contamination from on-going manufacturing operations, especially in stormwater;
- Redevelopment of the Cabot site;
- North Lagoon remedial action; and
- Public health concerns as several persons complained of foul odors that originated from the Site as well as unexplained illnesses.

EPA provided responses to these concerns by assuring the community that the Site is undergoing remedial action that will effectively address the aforementioned concerns.

3.3.2 Current Community Concerns

The community concerns that have been presented to EPA in regards to the off-site contamination consist of the following:

- Consistent communication is needed among EPA, the PRP, and the community;
- Efficiency of the remedial action proposed for the off-site contamination;
- Revision of the FS;
- Extension of the public comment period;
- Development of the CIP; and

- Conduct more thorough investigations surrounding the extent of contamination.

Table 3.1, Summary of Current Community Concerns and EPA Responses, presents a summary of the major concerns expressed by the community during the community interviews and public meeting held in July of 2010.

Table 3.1 Summary of Current Community Concerns and EPA Responses

Concerns	Responses
Remedial Investigation/Feasibility Study (RI/FS) is not defensible as the risk assessment is unclear and the regulatory languages are not consistent (i.e., State versus Federal regulations).	It is best to review the material provided in the repository and participate in the public comment period as further information will be provided that may provide support to the risk assessment and opportunities to present concerns will be available.
Requested basic information sessions though it seems EPA is not taking the community seriously. The remedial processes are not considering the needs of the community. The community recently identified a Technical Advisor who will have approximately two weeks to review all Site-related documents before the Public Comment Period.	EPA supports community engagement and will provide sessions for the community to become more educated on the remedial action process as well as common terminology.
The public meeting with EPA contractor E-Squared (E2) seemed to be put E2 in the middle of the community and EPA. It seemed as if EPA used E2 as a decoy from the remedial process. At this point, the community feels as though reuse/redevelopment information is inadequate as remediation has not been completed or adequately addressed.	EPA will continue to investigate means of reuse and redevelopment for the Site at the conclusion of the remedial action issued for the cleanup of the off-site contamination. EPA also supports interagency communication where all involved parties are provided the opportunity to thoroughly research all options and discuss them with EPA prior to the implementation of any decision.
Administrative Record (AR) is not user-friendly as documents are confusing. Feasibility Study (FS) relied on previous studies which are not readily available for public use such as the groundwater monitoring data and risk assessment (parts were rejected and other parts were not). The community also expressed concern with the timing of the provision of the AR and the challenges that it presents to the TAG recipient to review prior to the submittal of the Proposed Plan.	EPA provided the AR for the community to review all approved documentation regarding the remedial action for the Site's cleanup. The AR is located at the Site's designated repository and is available to the public. The EPA conducts repository checks every three years to ensure the availability of all documents referred in the AR. Should it be necessary, EPA will conduct a repository check to ensure the quality of the information provided in the AR and its availability.
Requested the participation of local government in the remedial process with the community.	EPA will continue to provide inter-agency support by including local governments and community partners in public meetings.
Concerned with off-site contamination as high dioxin levels were detected in residential properties. Groundwater was also tested and was identified to have contamination detected as well.	Further investigations surrounding the extent of contamination for both the groundwater and soils will be addressed in the Proposed Plan. Should a particular area be of concern, it is suggested that the information be provided to EPA for further examination.
Appropriate storm water management does not appear to be a part of the remedy. PRP proposed a remedy for storm water management which may not be adequate.	Stormwater management is being addressed in the Proposed Plan. Specific comments should be made in regards to the storm water management during the public comment period.

Concerns	Responses
Can the community push for re-zoning developments?	The local government and community will have to make that decision as EPA cannot. The local community would have to present their desires for a particular area's zoning to their local government.
The community is concerned that EPA's schedule is not in compliance with theirs as the push for the proposed plan meeting is not considering the selection of the technical advisory group.	EPA extended the period of public comment beyond the required 30 days to provide ample time for the public to review all technical documentation. (90 day comment period)
Community outreach with the Stephen Foster neighborhood was discussed as a large number of the residents are elderly and are limited in computer access.	EPA can provide education on the current status of the Site to ensure that all residents are provided information.
City and County officials desired to be more involved in the community and public outreach by having more notice in public meetings to ensure no scheduling conflicts.	EPA will hold to the commitment of informing the local government and community prior to finalizing the proposed meeting dates and times to ensure full participation.
Informational sessions provided by EPA to better educate the community of the proposed remedial action.	EPA will provide an availability session to the community prior to the conclusion of the public comment period. These sessions are informal and open to involve the discussion of the Site activities, proposed remedial action, and other Site-related topics.
The inconclusive nature of the FS.	Community persons presented concerns with the ineffective conclusion the FS provided as there were concerns surrounding areas that were not addressed such as the burial area, groundwater contamination, and residential properties. All comments will be addressed in a Responsiveness Summary after the comment period is concluded.
Residential indoor air sampling not being conducted by EPA.	EPA will continue to review data and will make a final determination on this concern.
Residential soil sampling not fully conducted by EPA.	EPA will continue to review data and make a final determination.
Relocation for affected community persons.	Relocation is not a factor that the EPA mandates, but that private land owners and the PRP could discuss through review of their own financial agreements concerning any restrictions that are associated with the individual properties (based on site data).
Effectiveness of the proposed remedial action.	The community expressed an ineffective nature of the proposed remedial action and is suggesting that it seems as if the contamination is not being cleaned but covered by a tarp. EPA works to ensure that the selected remedial action implemented at the Site will achieve cleanup goals and promote the well-being of the general public and the environment.

Section 4.0
EPA's Community Involvement Program

The overall goal of EPA's community involvement program is to promote communication between citizens and the EPA and to provide opportunities for meaningful and active involvement by the community in the cleanup process. EPA will implement the community involvement activities described below. The following plan is based on the results of the community interviews described earlier; it addresses each issue that was identified as being important to the community.

4.1 The History of the Development of the CIP

Issue 1: Maintaining the Most Current Site Information for the Public

Activity 1A: Establish a liaison for the Community and the EPA

- Objective: To provide a primary liaison between the community and the EPA, and to ensure prompt, accurate, and consistent responses and information dissemination about the Site. In those instances where EPA's CIC may be unable to provide adequate information (such as on technical issues), inquiries will be directed to the appropriate EPA contact.

- Method: EPA will designate an EPA CIC to handle site inquiries and serve as a point of contact for community members. The CIC is appointed by Region IV. Ms. L'Tonya Spencer serves as the EPA CIC assigned to the Site. She will work closely with Mr. Scott Miller, EPA's RPM.

- Timing: The CIC was became actively involved in 2008.

Activity 1B: Prepare and Distribute Site Fact Sheets and Technical Summaries

- Objective: To provide citizens with current, accurate, easy-to-read, easy-to-understand information about the Site.

- Method: Fact sheets will be mailed to all parties on the Site mailing list. In addition, copies will be available at the information repository, the Web, and other locations as identified by the Community.

- Timing: EPA will prepare and distribute fact sheets as needed.

Activity 1C: Provide a Toll-free "800 Number"

- Objective: To enable citizens to get the latest information available when they want it, rather than having to wait for a meeting or a fact sheet, and without incurring any cost.

- Method: EPA will activate the 800 number and publish it periodically in the local papers and in all fact sheets.

- Timing: The line is currently operational (1-877-718-3752).

Activity 1D: Development of a Mailing List for the Site.

- Objective: To facilitate the distribution of site-specific information to everyone who needs or wants to be kept informed about the Site.

- Method: EPA will create a mailing list that includes all residences adjacent to the Site, in known or suspected paths of migration, or those otherwise affected by the Site. EPA will also solicit interested parties via fact sheets, newspaper articles, public meetings, public availabilities, etc.

- Timing: EPA has developed a Site Mailing List and an e-mail list, which will be updated as needed.

Activity 1E: Establishment and Maintenance of the Designated Information Repositories

- Objective: To provide a convenient location where residents can go to read and copy official documents and other pertinent information about the Site and EPA activities.

- Method: The repository is a reference collection of site information containing the Administrative Record file, other site-specific information, the CIP, information pertaining to the TAG program, and the general Superfund process. The designated repository is accessible to the physically challenged, will have copier facilities, and will be available to residents during normal business hours and at least some evening and/or weekend hours. Additional repositories may also be established, including one at EPA Region IV.

- Timing: EPA established the local repositories at the Alachua County Library located at 401 East University Avenue; Gainesville, Florida 32601. EPA will continue to provide additional documents as they become available.

Activity 1F: Provide Site and Superfund Information on the Internet

- Objective: To provide key resources for searching and listing both general and specific information pertaining to the Superfund and hazardous waste issues.

- Method: General information about EPA and Superfund can be found at the following web site URL addresses:
  - EPA Headquarters: http://www.epa.gov
  - EPA Region 4: http://www.epa.gov/Region4/

  The Proposed Plan and the ROD will be placed on the internet as they are completed.

- Timing: Site Status Summaries are updated periodically.

Activity 1G: Provide TAG Information

- Objective: To provide resources for community groups to hire technical advisors who can assist them in interpreting technical information about the Site.

- Method: EPA will provide information about the TAG program at public meetings and in Site fact sheets. EPA will also provide briefing sessions to interested groups as requested. EPA will provide TAG applications and assistance to qualified groups.

- Timing: EPA awarded the TAG to Protect Gainesville's Citizens, Incorporated in June 2010.

Activity 1H: Establish and Maintain the Administrative Record

- Objective: To provide residents with an index of all documents generated and referred to by the EPA in the decision process of the Site remediation.

- Method: EPA will provide at least two sets of the Administrative Record. One will be located at the EPA Region IV Office and one will be located at the the Alachua County Library (the repository).

- Timing: The Administrative Record is generated at the beginning of site investigations. Additions to the Administrative Record will continue to be included until the last ROD is signed. EPA provided an updated Administrative Record to the community in June 2010.

Activity 1I: Development of the Community Involvement Plan

- Objective: The CIP is considered a *living document*, which means that it can be revised at or before the standard three year term – refer to Activity 2D. This document provides thorough discussion of the Site history, cleanup progress, community concerns, community participation/events, and community contacts. The mission of the CIP is to serve as a document that represents the community and its relation to EPA.

- Method: EPA will develop a draft CIP prior to cleanup activities and will present the draft to the community for comments. All comments will be reviewed and, if necessary, addressed in the CIP. The Final CIP will be available on the EPA webpage and repository.

- Timing: The CIP is to be developed prior to initiating any cleanup activity. However, due to the late timing of the established CIC, a CIP was not developed during the initial Cabot-related cleanup activities and as a result, was not developed until the initial portion of the Koppers cleanup phase in July 2010. A public comment period was offered to the

community for the development of the Final CIP. The comments provided by the community are presented in Appendix H, Comments from the Public for the Final CIP.

Issue 2: Provide Effective Opportunities for Community Involvement

Activity 2A: Schedule Public Meetings

- Objective: To inform the community on the most current Site developments and address community concerns.

- Method: Refer to Appendix G for suggested meeting locations. EPA will schedule, prepare for, and attend all announced meetings. EPA will provide at least two weeks' notice of the scheduled meeting. The RPM, CIC, and other appropriate EPA personnel will attend.

- Timing: Additional public meetings may be scheduled to continue updating the community on the progress of the cleanup of the Site.

Activity 2B: Solicit Comments Generated During the Proposed Plan Comment Period

- Objective: To offer the community an opportunity to review and comment on various EPA documents, specifically the Proposed Plan. This Public Comment Period will provide the community opportunities to participate in the process and also provide EPA and the PRP valuable information which will be considered during the decision process.

- Method: EPA will announce each comment period separately. Announcements will appear in local newspapers and EPA fact sheets. The announcements will include information regarding the duration of the public comment period and suggestions for presenting and submitting public comments. EPA may request public comments pertaining to public documents such as the CIP, preliminary findings, etc.

- Timing: The comment period is scheduled for July 15, 2010 through August 15, 2010. The comment period was extended an additional 60 days.

Activity 2C: Prepare and Issue a Responsiveness Summary

- Objective: To summarize all submitted comments received during the public comment periods as well as document the manner in which EPA has considered those comments during the decision-making process. Response to the major comments will also be provided.

- Method: EPA will prepare a Responsiveness Summary as a section of the ROD. The Responsiveness Summary will include four sections: Overview; Background on Community Involvement; Summary of Comments Received and Agency Responses; and Remedial Design/Remedial Action Concerns. All information, both technical and nontechnical, will be conveyed in a manner that is understood by all stakeholders.

- Timing: EPA will issue the Responsiveness Summary as part of the ROD.

Activity 2D: Revision of the CIP

- Objective: To identify and address community needs, issues, or concerns regarding the Site or the cleanup remedy that are not currently addressed in the previous CIP.

- Method: The Revised CIP will update the information presented in the previous version.

- Timing: EPA will revise the CIP as community concern warrants or at minimum, every three years until the all Site activities have been concluded. It has been decided that this CIP will be reviewed and considered for revision every six months from the release date(s).

Table 4.1 Time Frame Summary for Community Involvement Activities

ACTIVITY	TIME FRAME	DATE COMPLETED
Designate an EPA CIC	A CIC is designated throughout the entire duration of the project.	2008
Prepare and distribute Site fact sheets and technical summaries	As needed/warranted	On-going
Provide a toll-free "800 number" for the community to contact EPA	Currently in operation	1-877-718-3752 1-800-435-9234
Maintain a mailing list for the Site	Established upon Site discovery; updated as needed	Ongoing
Establish and maintain Information Repositories	Established; Update documents as needed. Repository investigations are performed, at minimum, every three to five years or as needed.	Repository has been established and a repository investigation was performed in August 2010.
Provide Site and Superfund information on the Internet	Currently available; update as needed	On-going
Provide Technical Assistance Grant (TAG) information	Completed for the award term	Protect Gainesville's Citizens was awarded the TAG in June 2010
Establish and maintain the Administrative Record	Established; update as needed	Re-established 2009
Hold public meetings	Ongoing; as needed	August 2010 (Proposed Plan Meeting); October 2010 (Public Availability Session)
Make informal visits to community	As needed	On-going
Solicit comments during a Public Comment Period	As needed and required	July 2010 – October 2010 (extended 90 day comment period)
Prepare and issue a Responsiveness Summary	Following public comment periods	Upon the conclusion of the Public Comment as part of ROD – Issued February 2, 2011 via Press Release and EPA Web Site.
CIP Revision	As needed, at least every 3 years (6 month review for additional comments)	November 2010; May 2011

Appendix A
EPA Regional Contacts

The following is a partial listing of the EPA Regional Contacts designated to the Site progress.

Mr. Scott Miller
EPA Region 4
Superfund Division
61 Forsyth Street, SW
Atlanta, GA 30303-8960
Tel: (404) 562-9120
Miller.scott@epa.gov

Ms. L'Tonya Spencer
EPA Region 4
Community Involvement Coordinator
Superfund Division - OSPAO
61 Forsyth Street, SW
Atlanta, GA 30303-8960
Tel: (404) 562-8463
Spencer.latonya@epa.gov

Appendix B
Local Officials

The following is a partial listing of the local contacts that can assist with local emergencies in the city of Gainesville and Alachua County area.

Mayor Craig Lowe
200 East University Avenue
Gainesville, FL 32601
Tel: (904) 387-8909
Email: mayor@cityofgainesville.org

Alachua County Board of Commissioners
P.O. Box 2877
Gainesville, FL 32602-2877
Tel: (352) 264-6900
Email: bocc@alachuacounty.us

Appendix C
Federal and State Officials

The following is a listing of the State of Florida Officials.

Governor Charlie Crist
Office of the Governor
State of Florida
The Capitol
400 South Monroe Street
Tallahassee, FL 32399-0001
Tel: (850) 488-4441

Senator Bill Nelson
716 Hart Senate Office Building
Washington, DC 20510
Tel: (202) 224-5274
Email: billnelson.senate.gov

Appendix D
Affiliated Agency Contacts

The following is a partial listing of the affiliated agency contacts. The contacts may provide additional historical information pertaining to the Site and current progress.

Florida Department of Environmental Health
3900 Commonwealth Blvd
Tallahassee, FL 32399
Tel: (850) 245-2118

ATSDR Region 4
EPA - Waste, Region 4
Atlanta Federal Center
61 Forsyth St., SW
Atlanta, GA 30303
Tel: (404) 562-1788

Florida Association of Soil and Water Conservation Districts
Administrative Consultant
16806 NW 40th Pl.
Newberry, FL 32669
Tel: (352) 472-5462

Florida Department of Environmental Protection
3900 Commonwealth Boulevard M.S. 49
Tallahassee, FL 32399
Tel: (850) 245-2118

Appendix E
Environmental and Active Citizens Groups

The following organizations provide insight on environmental issues specifically focused on the City of Gainesville.

Alachua County
Environmental Protection Department
Chris Bird, Director
201 SE 2nd Ave, Suite 201
Gainesville, FL 32601
Tel: (352) 264-6801
Email: chris@alachuacounty.us

Keep Alachua County Beautiful
602 S. Main St.
Gainesville, FL
Tel: (352) 371-9444

Conservation Fund
12 W. University Ave.
Gainesville, FL
Tel: (352) 264-7903

Alachua Conservation Trust
12 W. University Ave.; Suite 201
Gainesville, FL
Tel: (352) 373-1078

Protect Gainesville's Citizens (Technical Assistance Grant-TAG Recipients)
Cheryl Krauth
802 W. University Avenue
Gainesville, FL 32601
Tel: (352) 262-2442

Appendix F
Media Contacts

The following is a listing of the television, radio stations, and newspaper media outlets that provide service to the Alachua County area.

Radio Stations

WUFT 89.1
P.O. Box 118405
Gainesville, FL 32611
Tel: (352) 392-5200
Main: radio@wuft.org

WYFB 90.5
Bible Broadcasting Network
11530 Carmel Commons Blvd.
Charlotte, NC 28226

91.7 FM Studio
The Seagle Building
408 W. University Ave; Suite 206
Gainesville, FL 32601
Tel: (352) 373-9553

Smooth FM 100.9
WXJZ-FM
4424 NW 13th St.; Suite C-5
Gainesville, FL 32609
Tel: (352) 375-1317
E-mail: feedback@wxjz.fm

ROCK104 Studio
University of Florida
3200 Weimer Hall
Gainesville, FL 32611
Tel: (352) 392-0771

KISS 105.3
7120 SW 24th Ave.
Gainesville, FL 32607
Tel: (352) 331-2200

AM850 – WRUF Radio
P.O. Box 14444
Gainesville, FL 32604
Tel: (352) 392-0771

Television Stations

WUFT-TV
P.O. Box 118405
Gainesville, FL 32611
Tel: (352) 392-5551
Email: info@wuft.org

WCJB TV20
6220 NW 43rd St.
Gainesville FL 32653
Tel: (352) 377-2020
Email: tv20news@wcjb.com

WOFL-FOX35
35 Skyline Dr.
Lake Mary, FL 32746

WGFL-CBS4
1703 NW 80th Blvd.
Gainesville, FL 32606
Tel: (352) 332-1128

Appendix F
Media Contacts (Continued)

Newspapers

The Gainesville Sun
P.O. Box 147147
Gainesville, FL 32614-7147
Tel: (352) 378-1411

The Independent Florida Alligator
1105 W. University Ave.
Gainesville, FL 32601
Tel: (352) 376-4458

INsite Magazine
1010-B NW 8th Ave.
Gainesville, FL 32601
Tel : (352) 377-6602

Senior Times
4400 NW 36th Ave
Gainesville, FL 32606
Tel: (352) 372-5468

Appendix G
Meeting Locations

The information provided below relates to the locations of the facilities designated for public review of all Site documents and public meetings.

Information Repositories and Public Meeting Locations:

Stephen Foster Elementary
3800 NW 6th St.
Gainesville. FL 32609
Tel: (352) 955-6706

Santa Fe College Board Room
3000 NW 83rd Street
Gainesville, FL 32606
Tel: (352) 395-5000

Alachua County Library District Headquarters
401 E. University Avenue
Gainesville, FL 32601
Tel: (352) 334-3900

Eastside Community Center
2841 East University Avenu
Gainesville, FL 32601
Tel: (352) 334-2714
Contact: Mr. Ross
For Availability: (352) 334-2189
Contact: Ms. Virgina Shay

Appendix H
Comments from the Public for the Revised CIP

Concern	Means of Addressing
Approximation of 2009 population estimate – suggested that the reference for the population estimate for Alachua County be the University of Florida Bureau of Economic and Business Research (UF BEBR) as its population estimate suggests 256,232 residents for Alachua county with approximately 107,260 residents living within unincorporated areas.	The population cited using the U.S. Census stated approximately 243,574 residents in Alachua County (a difference of 12,658 residents). To minimize confusion with the document, a footnote reference was incorporated in the appendix providing the estimate presented by UF BEBR.
Focus on the entire Cabot site in the Site History section of the CIP as opposed to the area of concern, the Koppers site. Presenting such a focus gives a false perception of the actual period where the CIP and EPA community relations were established.	The Site history is an inclusive section of the CIP. For many Sites where there may be several sub-sites, as with Cabot Koppers, the Site history will discuss all sub-sections. The perception of EPA community relations was never falsified in the document clearly states in Section 4.1 – The History of the Development of the CIP, that the EPA CIC was designated in 2008. However, to further solidify this concern and continue with the transparency of the EPA to the Gainesville community, another activity, Activity 1I – Development of the Community Involvement Plan, was included in Section 4.1 which clearly discusses the un-timeliness of its publication in relation to the initial cleanup activity. In addition, the title of the CIP has been modified from the 'Cabot Koppers Community Involvement Plan' to 'Koppers Community Involvement Plan'. This is to ensure the public's perception of the focus point of the community plan.
Page 1 of the draft CIP: Factual error with the draft publication date which is observed as the listed date of August 9, 2010; however, the draft CIP was not made available to the public until August 16, 2010.	The date was confirmed and modified to August 16, 2010.
Page 1 of the Draft CIP: Factual error with the 'wood-treating operations activities being conducted since 1916'. Historical records indicate that these activities were conducted prior to 1916.	The date of the wood-treating operations is confirmed by EPA documents as 1916. However, the following statement will be included in the CIP in regards to this observation: 'Wood-treating operations were conducted on the Site, which is currently owned by Beazer East, since the early 1900s. A similar statement is presented in Section 2.2 – Site Investigations and Cleanup Activities, and has been modified to the aforementioned statement.
Page 15 of the Draft CIP: Factual error was observed with the toll-free number provided for community concerns. This concern surfaced when the phone number did not function properly. The number provided was 1-800-718-3752.	This observation is correct. EPA modified the community hotline in the revised CIP.

Appendix H
Comments from the Public for the Final CIP (Continued)

Concern	Means of Addressing
Page 1 of the Draft CIP: Factual error was observed in the first paragraph of the Draft CIP where it states, "The Draft CIP was submitted and made available to the public on August 9, 2010." This is incorrect as the public was not provided the CIP until August 16, 2010.	This observation is correct. EPA modified the Draft CIP to provide the correct publication date.
Page 1 of the Draft CIP: The document briefly discusses the types of contaminants of concern and media where the contaminants are identified. However, the brief number of contaminants discussed in this section does not adequately characterize the full extent of the contaminants that exist in the on and off-site areas.	To better discuss the nature and extent of contamination identified in off- and on-site media, EPA provided a table from the Cabot Koppers NPL website which discusses the contaminants of concern.
Page 10 of the Draft CIP: The text reads, "The former community concerns are those that were documented prior to the preparation and implementation of the off-site remedial action proposed plan meeting held on August 4, 2010." The correct date for the meeting was Thursday August 5, 2010.	This observation is correct. EPA modified the Draft CIP to provide the correct public meeting date.
The CIP boiled the 300 or more documented citizens' comments into seventeen (17) one-paragraph table entries, many of which either do not properly characterize the issue that was originally expressed, are incomplete, or do not provide adequate answers to the original issue.	This section was intended to summarize the major community concerns and not create individual statements for the document. The focus of this document is to provide a general summary of the major comments highlighted during the community interviews and focus group meeting.
Table 3.1 of the Draft CIP: One of the biggest hot button issues in the community (the one that sparked the lawsuit) is this "concern" (listed on the second page of the table): "Relocation for affected community persons." EPA answered with this "response": "EPA will not relocate any person affected by the Cabot Koppers Site as contamination does not reflect alarmingly high concentrations." That's a really strong statement to make when you consider the previous concerns/responses in the table, where the EPA consents that it is unclear if more testing needs to be done in residential dwellings and in residential yards. It was apparent to the community, as stated by EPA, that relocation was not something the EPA mandates, but that private land owners and Beazer could come to their own financial agreements about any restrictions that get placed on the individual properties (based on site data). The way this was answered here, it makes it sound like EPA does have the power to issue a relocation mandate to the PRP, but that they won't in this case. And then the reasoning for why they/you won't looks..."not based on good science."	The EPA reviewed and modified the response regarding the relocation issue, with approval from EPA Management, to reflect the response provided during the public meeting.

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010

U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPOSED PLAN FOLLOW-UP PREFERRED REMEDY FACT SHEET

September 2010

Cabot Carbon/Koppers Superfund Site — **Gainesville, Alachua County, Florida**

Introduction

This fact sheet, issued by the U.S. Environmental Protection Agency (EPA) provides clarification and additional information about the preferred remedy in the Proposed Plan for the Cabot Carbon/Koppers Superfund Site (Site), Gainesville, Alachua County, Florida. EPA presented the preferred remedy for the Site during a public meeting held on August 5th, 2010. The EPA determined that it should provide more details and clarification of the preferred remedy in response to questions and concerns voiced by the community during that meeting. A separate fact sheet for off-Site soil cleanup activities is being prepared.

This fact sheet provides a brief Site summary, addresses specific components of the preferred remedy, and discusses community concerns relating to remedial activities. Off-site soil cleanup concerns are addressed in a separate fact sheet

Site Summary

The Cabot Carbon/Koppers Superfund Site is located in a commercial and residential area of the northern part of the Gainesville city limits, Alachua County, Florida. This Site was originally two Sites: Cabot Carbon in the southeast portion of the Site, and Koppers on the western portion of the Site (Figure 1). Cabot Carbon was a pine tar and charcoal generation facility, but is now commercial property. Koppers was an active wood-treating facility until December 2009. Although remedial investigations at the Cabot Carbon/Koppers Site began in 1983 and are now completed, EPA will continue to collect sampling data for groundwater, soil, sediment, and surface water to evaluate the effectiveness of the remedy over time.

From this point forward, the word "Site" will refer to the Koppers portion of the Cabot Carbon/Koppers Superfund Site, unless otherwise specified. The Site remedial action will also address off-Site areas contaminated

Availability Session
Date: October 6, 2010
Time: 6:00 PM to 9:00 PM

Location: Eastside Community Center
2841 East University Avenue
Gainesville, Florida 32601

The community is invited to a public availability session regarding the Cabot Carbon/Koppers Site. Representatives from EPA, the Florida Department of Health (FDOH), and the Alachua County Environmental Protection Department (ACEPD) will be available to provide information and answer questions about upcoming activities at the Site.

The Administrative Record file for the Cabot Carbon/Koppers Site is available at the following location:

Alachua County Library
401 E. University Ave.
Gainesville, FL 32601
(352) 334-3900
www.aclib.us/locations/headquarters

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010
(Continued)

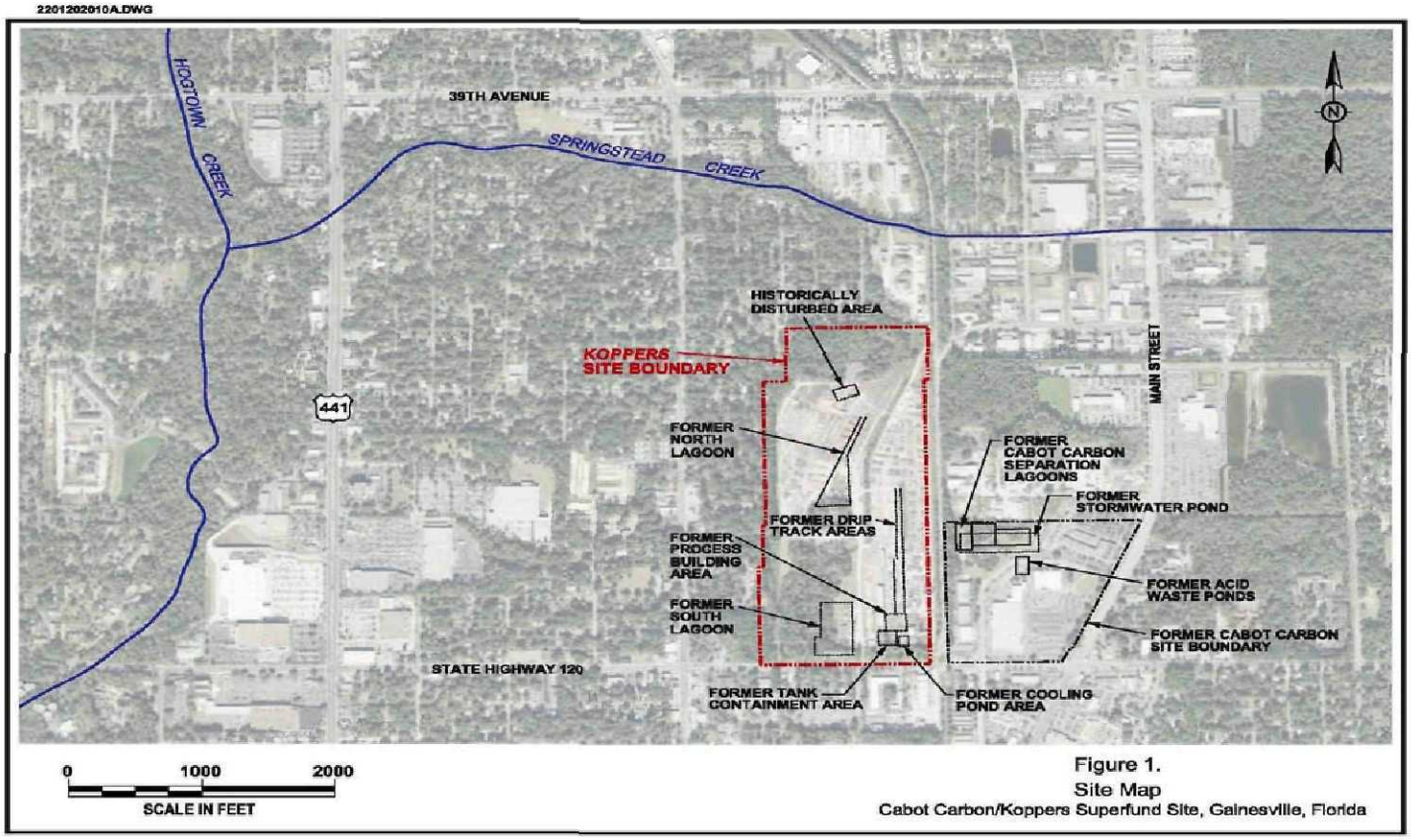


Figure 1.
Site Map
Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

by Site-related activities, including residential and industrial areas surrounding the Site and Hogtown and Springstead creeks to the north and west of the Site. Site contamination is a result of releases of wood-treatment chemicals. Four potential source areas have been identified at the Site (Figure 2). Site contaminants are associated with the historical use of creosote for wood treating and include mobile and/or residual dense non-aqueous phase liquids (DNAPLs). DNAPLs are organic substances that do not mix with and are heavier than water. Site contaminants also include arsenic, polycyclic aromatic hydrocarbons (PAHs), and dioxins/furans in soil sediment and groundwater. The most predominant contaminant in groundwater is PAHs. The Feasibility Study (FS) and Proposed Plan provide for additional details.

Preferred Remedy Description

The selected alternative is the result of years of collaborative effort and thorough review on the part of many organizations, including input from local agencies and the public. The alternative is robust and protective of human health and the environment. Remedy selection is the final step in the Superfund process before cleanup design and action.

The preferred remedy will protect human health and the environment by containing, treating, and controlling contamination associated with the Site. This remedy was selected over other options evaluated because as a whole it was determined to provide the optimal solution based on Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) FS evaluation criteria. The selected remedy is compatible with the anticipated future use of the property, as described in more detail below.

The selected remedy has three parts that address three distinct media groups: on-site media (soil and groundwater above the Upper Floridan Aquifer [UFA]), groundwater in the UFA, and off-Site media (soil, sediment, and surface water). The major components of the three parts of the remedy are summarized on Table 1 of this fact sheet. Additional details on the preferred remedy components are presented below. Off-site soil cleanup concerns are addressed in a separate fact sheet.

Preferred Remedy Community Concerns

On-site Soil and Groundwater Cleanup

The public has expressed concern about the proposed on-site remedy. EPA is aware of the public's concerns and in an effort to provide additional information has prepared the following specific responses to community questions.

Why not dig up all DNAPL-impacted soil?

Excavation of source area soils containing DNAPL was evaluated in comparison with other options during the FS process. The preferred on-site remedy, summarized on Table 1, was determined to be the optimal alternative based on key criteria including remedy protectiveness.

Specific challenges associated with soil excavation at the Site are:

1. Excavation depths and large soil volume

The two source area excavation alternatives considered during the remedy selection process (removal of soil within the Surficial Aquifer or removal of soil to the Hawthorn Group middle clay unit) would present significant challenges due to the excavation depths and the large amounts of soil that would be removed. The Surficial Aquifer soil removal would require digging to an approximate depth of 25 feet below ground and removing approximately 280,000 cubic yards (420,000 tons) of soil. The Hawthorn Group middle clay soil is deeper and removal would require digging to an approximate depth of 65 feet below ground and removing approximately 1,800,000 cubic yards (2,700,000 tons) of soil. Excavating soil to these depths would require shoring to keep the

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

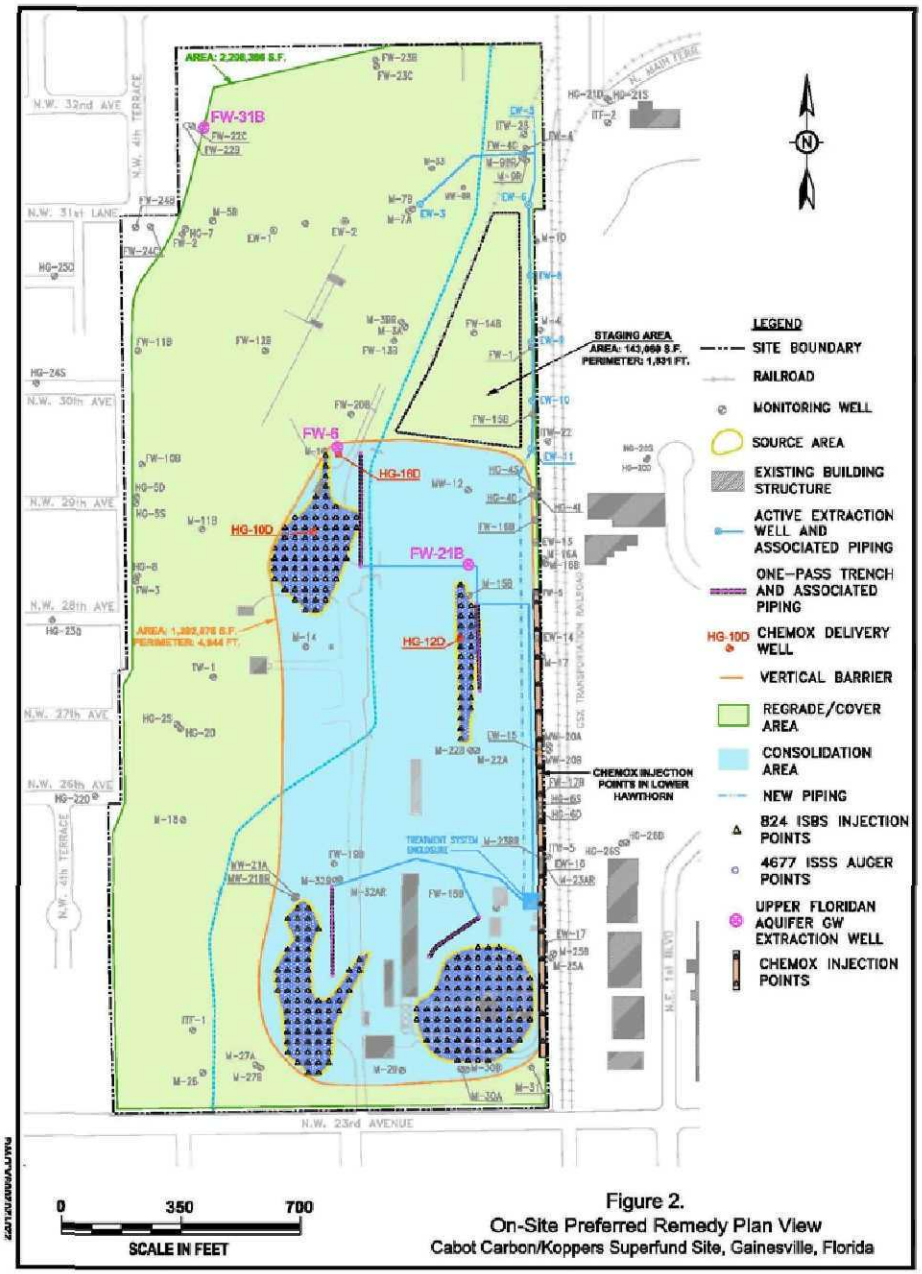


Figure 2.
On-Site Preferred Remedy Plan View
Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

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Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

Table 1: Preferred Remedial Alternative Summary

On-site Media

- Establishment of an on-site soil consolidation area that includes:
  - A single, continuous vertical barrier wall (approximately 65 feet deep) encircling all four source areas from land-surface to the Hawthorn Group middle clay.
  - Establishment of a low-permeability cap/cover over the consolidation area to protect against rain infiltration and contamination migration.
- In place (in-situ) solidification and stabilization (ISS/S) of contamination in the upper Hawthorn Group zone at all four source areas.
- In-situ biogeochemical stabilization (ISBS) of DNAPL in the vadose-zone (the unsaturated zone above the water table) and in the Surficial Aquifer (less than 25 feet below ground surface) at all four source areas through injection of oxidizing and stabilizing chemicals into the ground surface. This treatment is subject to acceptable performance demonstration during pilot tests or treatability studies). Pilot tests/treatability studies are tests conducted with contaminated Site materials and stabilizers to determine if cleanup goals will be met.
- In-situ injection of oxidizing chemicals or ISBS treatment in the Lower Hawthorn Group at all four source areas, and along the eastern property boundary.
- Excavation of soil posing a leachability concern outside of the consolidation area; placement of excavated soil in soil consolidation area.
- Surface grading and cap covers on approximately 83 of 86 acres on the Site property.
- Installation of storm water controls and improvements (e.g., retention/ detention pond).
- Continued operation of the northern perimeter wells of the Surficial Aquifer extraction and treatment system (outside of the consolidation area) until cleanup goals are attained.
- Continued operation of the horizontal collection drains of the Surficial Aquifer extraction and treatment system as needed to contain potential migration of ground water contamination (hydraulic control).
- Expansion of the Surficial Aquifer and Hawthorn Group monitoring network.
- Institutional controls such as deed restrictions to prevent future digging that would result in contact with contaminated media.

UFA Groundwater

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

Off-Site Media

For soil contamination, a range of optiors are proposed for use on individual subparcels with the consent of private property owners including:

- Excavation and removal of impacted soil that exceeds cleanup goals based on present use of the land. Excavated soil will be transported and placed within consolidation area on-site.
- Engineered controls that prevent contact with impacted soil containing contamination that exceeds cleanup goals based on present use of the land use.
- Institutional controls to protect accessibility and use of land/properties.

For surface water and sediment in Hogtown and Springstead Creeks, proposed remedies include:

- On-site detention basin to mitigate on-going impacts to surface water and sediment.
- Excavation and removal of impacted sediment in excess of levels shown to likely cause an adverse effect when in direct contact (probable effects concentration). Excavated soil will be placed in the consolidation area on-site.
- Monitored natural recovery of remaining impacted sediment until concentrations reach threshold effects concentrations (contaminant concentrations above these levels could adversely effect a plant or animal) or background levels.

excavation walls from falling in on workers, and dewatering to remove groundwater that would flow into the excavation area during excavation.

Groundwater collected from the excavation area would require treatment and disposal. Construction of a staging/temporary storage area may be required. Excavated soil would require management as listed hazardous waste. All of these challenges, in turn, result in short-term health and safety risks to remedial workers and the nearby community and significant additional costs to the remedial effort.

2. Off-Site disposal challenges
Finding one or more disposal facilities that will accept the large quantities of contaminated soil would present a challenge. Land Disposal Restriction (LDR) and Best Demonstrated Available Technology (BDAT) rules establishing treatment standards for land disposal may require that contaminated soils from the Site be sent to one of the few hazardous waste incinerators that accept wood-treatment listed waste. It may also be necessary to treat soils on-site prior to off-Site disposal. Transporting the contaminated soils to an off-Site facility would require either about 15,000 (Surficial Aquifer excavation) or 95,000 (Hawthorn Group middle clay excavation) truck loads. More than 100 dump truck loads per day of contaminated soil could be driven through the areas surrounding the Site resulting in significant transport-related safety and environmental risks, as well as a significant nuisance to the surrounding areas for over 2.5 years.

3. On-site treatment challenges
If the material is treated on-site (by any method) and returned to the excavation, the risk reduction and volume treated is very similar to the in-situ treatment options, but with substantially greater short-term risk, engineering challenges, effort, time, and cost.

4. On-site construction of above ground landfill challenges
If the excavated soil is placed in an on-site constructed landfill instead of being returned to the excavation or transported off-Site, the resulting mound would be much larger than the mound considered for the gently sloped consolidation area. This would have serious technical and permitting challenges, would limit redevelopment opportunities, and would not be a welcome sight for the community.

5. Risk reduction not significantly different with excavation
Actual long-term human health and environmental risk reduction resulting from source area excavation would not be significantly different than in-situ treatment. Short-term risks would be significantly higher for soil excavation. Soil removal will not significantly reduce groundwater concentrations at potential receptors, including the Murphree Well Field. A long-term groundwater remedy would still be required. There is also a risk that residual DNAPL will move through the groundwater during excavation activities.

Why consolidate excavated soils on-site?
Because of the issues described above, containing soils on-site is the optimal solution for the community's needs. The soil consolidation area will be designed to contain the soil contamination and prevent human contact and migration in groundwater off-Site. The soil consolidation area is conceptually shown on Figure 2 and Figure 3.
The most contaminated soil (principal threat waste [PTW]) will be treated within the consolidation area. There will be a gentle slope on the containment area to prevent surface water from accumulating. Other storm water management controls such as rerouting and detention basins will be used to reduce the likelihood of surface water contact with potentially contaminated soil.

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

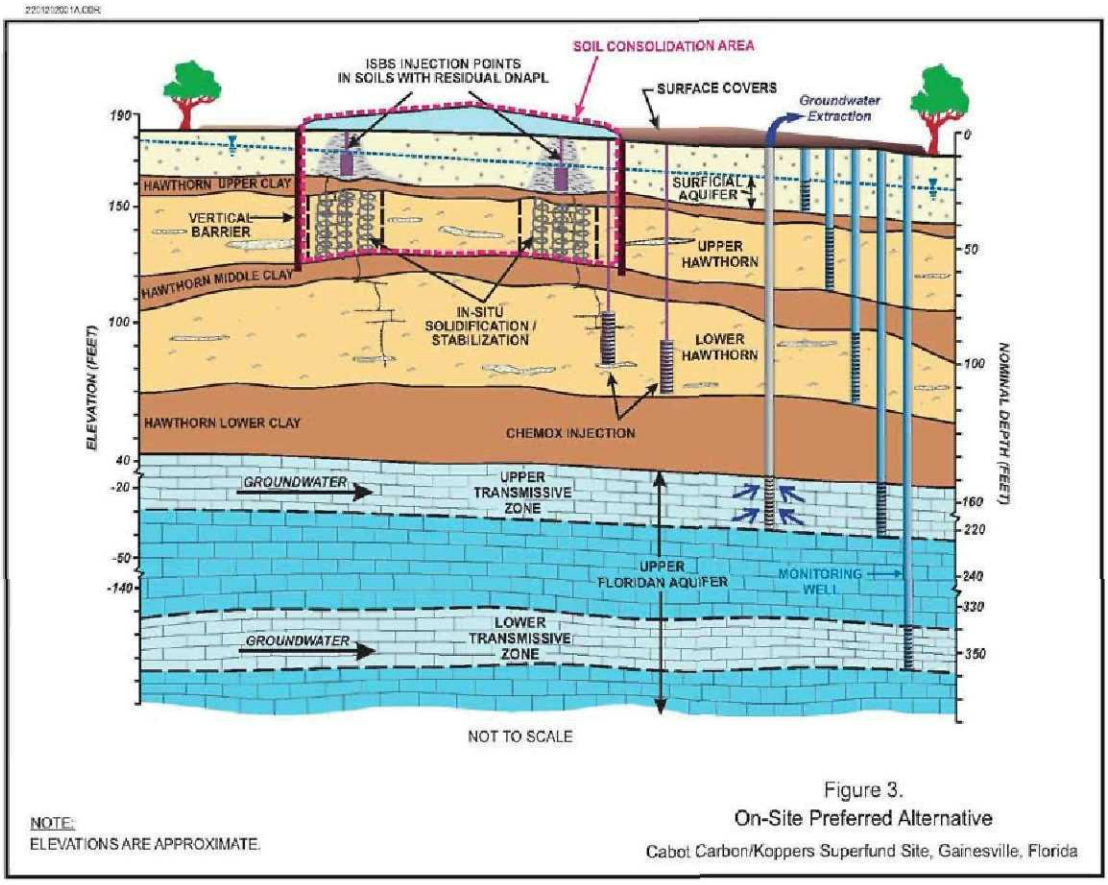

Figure 3.
On-Site Preferred Alternative
Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

NOTE:
ELEVATIONS ARE APPROXIMATE.

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

Is the soil consolidation area in violation of Florida laws?

The soil consolidation area being created on-site at the Koppers property is not considered a landfill that is has to meet land disposal restrictions (LDRs). The soil will be consolidated within an Area of Contamination (AOC). The National Contingency Plan (NCP) policy (55 FR 8758-8760) allows EPA to designate an AOC as an existing area of continuous contamination of varying amounts and types. LDRs will not apply if material is moved within an AOC, treated in place, or consolidated within an AOC. Establishment of an AOC facilitates remediation of contaminated sites.

How will groundwater be protected?

Given that digging up all the soil in source areas is impracticable and ineffective as detailed above, containment of source area materials is required for protection of groundwater. Source area materials within the on-site soil consolidation area will be contained (Figure 3). PTW within the area will be treated by in-situ methods and a robust containment system will be put in place to prevent migration away from the area. This strategy has been used successfully at many other Superfund Sites. At the Koppers Site, the contaminants will be contained by the following methods:

1. Continuous vertical barrier wall

The entire consolidation area will be surrounded by a continuous vertical subsurface barrier wall constructed of a cement/bentonite slurry (Figure 3). Slurry walls often are used in environmental remediation where contaminants that move through groundwater may pose a potential threat to a source of drinking water. They have been used for decades as long-term solutions for controlling seepage. Slurry walls are typically constructed of a soil, bentonite (clay), and water mixture. However, a cement/bentonite (such as proposed at the Koppers Site) or other mixture may be used for greater structural strength and to reduce degradation due to chemical interactions. The barrier wall will be joined to the top of the low permeability Hawthorn Group middle clay unit (approximately 65 feet below ground). Because the Hawthorn Group middle clay layer does not readily transmit water due to its low permeability and the surface cover/cap minimizes water from entering below the surface, the vertical barrier wall creates a subsurface containment area designed to completely surround the contaminated soil and groundwater in the surficial aquifer and Upper Hawthorn sediments.

2. Low permeability Hawthorn middle clay

The Hawthorn Group middle clay unit transmits very little groundwater as evidenced by pressure measurements above and below this clay unit. Working together, the vertical barrier wall and the middle clay layer will limit downward movement of contamination.

3. Low permeability surface cover/cap

The consolidation area will be covered with a low-permeability cap/cover that is a minimum of two feet thick and is constructed of clean material. This cover/cap will be gently sloped to promote storm water runoff and prevent pooling. The intent of the cap will be to prevent surface exposure to contaminated soil and limit rainfall from entering the subsurface within the consolidation area.

4. In-Situ Treatment

In-situ treatment of contaminated soil and groundwater within the consolidation area above the Hawthorn Group middle clay will reduce volume and toxicity of contaminated media and the potential for contaminant migration.

5. Groundwater monitoring

The EPA will monitor the groundwater in and around the soil consolidation area. Although it is unlikely, if increasing contamination concentrations are observed outside of the containment area, additional remedial actions may be evaluated for implementation.

6. Groundwater pump and treat system

Groundwater pump and treat systems will be operated in the Surficial Aquifer and the UFA to prevent contaminated on-site groundwater from moving off-Site.

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

7. Soils removal
Soils outside the containment area with concentrations high enough to pose a concern due to leaching to groundwater will be removed and placed within the containment/consolidation area. During the remedial design additional leachability studies will be done to assess areas for soil removal.

How will cleanup goals be met for soil outside of the soil consolidation area?
The green area on Figure 2 outside of the consolidation area that will be regarded and a clean soil cover of at least two feet thick will be placed over almost the entire property. The process of Site grading which is necessary for Site reuse preparation and stormwater management will result in the excavation of impacted surface soil. This soil will be moved to the consolidation area (blue area) of Figure 2. The clean cover with institutional controls will prevent contact with soils that may contain a low level of contaminants.

Why aren't residential cleanup goals selected for on-site soil?
EPA is required to look at reasonably anticipated future land uses in determining what cleanup criteria to apply at a Superfund Site. EPA has determined that unrestricted residential use is not a likely or practical future land use for the Site. However, a remedy that in effect meets Florida residential default cleanup standards has been selected. The remedy calls for clean soil to be placed over almost the entire Site. EPA has made its reasonably anticipated land use determination based on several factors including property owner Beazer East's planned retention of Site ownership and its indicated future use of the Site as commercial, recreational or mixed use with a residential component. Therefore, the EPA has determined that the reasonably anticipated future land use of the Koppers portion of the Site is likely to be commercial, recreational or mixed-use with a residential component.

What institutional controls will be applied at the Site?
Institutional controls will be applied at the Site to prevent exposure to subsurface soil and groundwater contamination. The institutional controls are controlled by local authorities and will become part of the property deed. They will prevent digging without formal plans to mitigate exposure to contaminants (via permits, etc.).

Will in-situ stabilization be effective?
In-situ stabilization/solidification (ISS) is proposed to treat source area contamination in the upper Hawthorn Group. In-situ biogeochemical stabilization (ISBS) is proposed to treat source area residual DNAPL in the vadose-zone (above the water table) and Surficial Aquifer. In-situ chemical oxidation or ISBS is proposed to treat contamination in the lower Hawthorn Group at source areas and along the eastern property boundary as an additional treatment method for groundwater migrating off-Site.

EPA has demonstrated the effectiveness of in-situ stabilization at other wood treatment sites with soil contaminated by DNAPL and mixed wastes. During the remedial design of this remedy, treatability studies will be conducted to determine the appropriate type and quantity of in-situ stabilizer that will bind the contaminated soil and meet requirements for effective stabilization. Treatability testing will use contaminated soils from the site to determine the type and amount of stabilizer needed.

A pilot test of ISBS has been conducted at the Site.

Off-Site Creek Cleanup
Community concerns and details regarding off-Site cleanup of nearby creeks are addressed below. Off-site soil cleanup activities are detailed in a separate fact sheet.

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

How are Hogtown and Springstead Creeks being addressed?

The selected remedy address citizen concerns with the creeks in two distinct ways. First, to address previous contamination of the sediments in each creek, sediments that have contaminant concentrations associated with either former Cabot Carbon or Koppers that exceed the threshold effects concentrations (i.e. contaminant concentrations in excess of levels that would adversely effect animal life) are required to be excavated and replaced with clean fill material. Assessment of creek sediments is ongoing. To address possible future impacts on sediments, the former Koppers facility is required to construct and operate a detention/retention pond(s) to capture storm water from the former Koppers Site prior to allowing it to be discharged to the tributary to Springstead Creek. The detention/retention pond(s) will be designed, including placement, during the remedial design of the on-site remedy.

Although future migration of contaminated soils due to storm water flow is highly unlikely due to the implementation of Site surface covers and consolidation of contaminated materials beneath a low-permeability cover/cap, storm water capture will allow potentially contaminated sediment to settle so that it will not be released to the creeks.

Other Community Concerns

General community concerns not covered in the previous sections of this fact sheet relating to the Koppers remedial action are addressed below.

Why was the FS not certified by a professional engineer?

The NCP regulations found at 40 Code of Federal Regulations (CFR) Part 300, contains the EPA regulations for implementing CERCLA, as well as governance on documents to be submitted to the agency. Per EPA FS guidance, the FS is a conceptual document that supports the design of selected remedies. The NCP requires certification of engineering design documents; therefore, design documents for the Koppers Site generated during the remedial design phase of the project, will be signed and sealed by a professional engineer registered in the State of Florida. The remedial design of the selected remedy will occur after the Record of Decision (ROD) is signed.

When will the Community Involvement Plan be updated?

EPA developed the Community Involvement Plan (CIP) to serve as a framework for community involvement and outreach efforts associated with the Cabot Carbon/Koppers Superfund Site. The CIP addresses the relationship between the Site, the community, and EPA; provides a background of the community; presents EPA's community involvement program; and provides a listing of resources. The goals of the CIP are to inform the public of planned and ongoing site activities; maintain open communication about site remediation; ensure that former concerns are acknowledged and addressed; provide interested parties with useful information; provide citizens with opportunities to comment on and be involved in technical decisions; and encourage and assist local citizens in providing input to agency decisions that will have long-term effects on the community. Information discussed during community interviews is essential in developing the CIP. The CIP update is expected to be complete by late September 2010.

How will EPA evaluate the cleanup process and what happens if it is unsuccessful?

EPA will evaluate the progress of the cleanup through confirmation sampling of soils and sediments once a remedy has been implemented. Groundwater sampling will continue after remedy implementation has taken place. Groundwater data will be evaluated to ensure that contaminant levels are reduced over time until target cleanup levels are met. Surface water discharges will also be sampled and analyzed on a quarterly basis to ensure that permitted levels are met. In addition, EPA is required to evaluate remedial action effectiveness once every five years in a Five-

Appendix I
Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

Year review to determine if the remedy is functioning as intended. If the remedy does not function as intended, EPA will update the remedy to include additional measures so that the updated remedy is effective.

What is being done to ensure no contamination has been missed at the Site?

A work plan is being developed for the remedial design phase of the project to identify if there are possible buried drums or other primary source areas on the Site. In addition, soil, groundwater, and sediment sampling and analyses will continue as the footprint for installation of all the remedial technologies is refined. After additional sampling and analyses occur and the remedial action is implemented, the proposed on-site actions will ensure exposure at the surface has been mitigated.

How are vapor intrusion possibilities being addressed?

The Site groundwater contaminant plume does not consist of significant concentrations of highly volatile components such as solvents or BTEX compounds. The primary concern in Site groundwater is low concentrations of naphthalene which are only partially volatile. Vapor intrusion is unlikely at wood-treatment sites, and is not anticipated to create a hazard at the Koppers Site.

What studies are being conducted to assess Site-related human health concerns?

Human health risks due to exposure to on-site contaminants have been assessed. Human health risk assessments typically look at the types of activities that may expose people to Site contaminants. In general, Site media concentrations are compared to various riskbenchmarks to determine whether the type of contaminant at its concentration present a risk. Contaminants that present a significant risk are included as Site chemicals of concern (COCs). COCs were listed in the Proposed Plan.

EPA provides information to the community regarding Site cleanup through fact sheets, public meetings, local Site information repository, and the Administrative Record file. Copies of data and reports generated during Site investigations for use in the remedy selection process are located in the Administrative Record file. This fact sheet will become part of the Administrative Record file for the cleanup decision for the Cabot Carbon/Koppers Superfund Site. The public may review this file at the Alachua County Library.

EPA will be providing an additional opportunity for the community to address any remaining questions they may have about Site cleanup during an availability session that will be held from 6:00 PM until 9:00 PM on October 6, 2010, at the Eastside Community Center, 2841 East University Avenue, Gainesville, Florida 32601.

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Proposed Plan Follow-Up Preferred Remedy Fact Sheet, September 2010 (Continued)

Availability Session

An availability session for the Cabot Carbon/ Koppers Superfund Site will be held from 6:00 PM until 9:00 PM on October 6, 2010, at the Eastside Community Center, 2841 East University Avenue, Gainesville, Florida 32601.

Mailing List

Anyone wishing to be placed on the mailing list for this Site should send his/her request to Ms. LaTonya Spencer, EPA Community Involvement Coordinator, at the above address. You may also call Ms. Spencer with your request at (800) 435-9234 or (404) 562-8463

Information Repositories

Information concerning the Cabot Carbon/ Koppers Superfund Site may be found at the following location:

Alachua County Library
401 E. University Ave.
Gainesville, FL 32601
(352) 334-3860
www.aclib.us/locations/headquarters

Appendix J
Glossary

Administrative Order on Consent (Administrative Order):
A legal agreement between the United States Environmental Protection Agency (EPA) and potentially responsible parties (PRPs) whereby PRPs agree to conduct or pay the cost of a site investigation and/or cleanup. In contrast to a consent decree, an administrative order by consent does not need to be approved by a judge.

Administrative Record File:
A file that is maintained for the public and contains information used to make a decision about a site under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The file is available for public review, and a copy is usually placed in the same location as the site information repository. A duplicate file is held at a central location, such as the EPA Regional office.

Agency for Toxic Substances and Disease Registry (ATSDR):
Superfund created ATSDR within the federal Public Health Service to work with other government agencies to initiate and implement a variety of health-related responsibilities. ATSDR develops toxicological profiles, prepares site-specific health assessments, establishes formal registries of persons exposed to hazardous substances, develops and disseminates health education information, establishes and maintains literature inventories on hazardous substances, helps prepare health and safety programs for workers at Superfund sites and workers responding to emergency releases, and provides health-related support in public health emergencies.

Availability Session:
An "open house" event hosted by EPA to meet informally with citizens about site activities.

Cleanup:
Actions taken to deal with a release or threatened release of hazardous substances that could affect public health or the environment. The term is often used broadly to describe various response actions or phases of remedial responses, such as the Remedial Investigation/Feasibility Study (RI/FS).

Cleanup Remedy:
A prescribed technical approach to reducing the concentrations of contaminants at a site. EPA selects a cleanup remedy from alternatives identified in the feasibility study after applying a set of balancing criteria and considering public comments.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA):
Federal Law, commonly known as Superfund, passed in 1980 and modified in 1986 by the Superfund Amendments and Reauthorization Act (SARA) to investigate and cleanup abandoned or uncontrolled hazardous waste sites (CERCLA is commonly known as Superfund, because the Act created a special tax that goes into a Trust fund). EPA either

pays for the site cleanup when the responsible parties cannot be located or are unwilling or unable to perform the remedial actions, or takes legal action to force responsible parties to cleanup the site or reimburse EPA for the cost of the cleanup.

Community Involvement Plan (CIP):

The goals of the CIP are to inform the public of planned and ongoing site activities; maintain open communication about site remediation; ensure concerns are acknowledged and addressed; provide interested parties with useful information; provide citizens with opportunities to comment on and be involved in technical decisions; and encourage and assist local citizens in providing input to agency decisions that will have long-term effects on their community

Feasibility Study (FS):

The second part of a two-part study called a remedial investigation/feasibility study. The feasibility study involves identifying and evaluating the most appropriate technical approaches to addressing contamination problems at a site. Alternatives are evaluated for their effectiveness in protecting human health and the environment.

Florida Department of Environmental Protection (FDEP):

An agency in Florida's government charged with most functions relating to environmental quality in the state.

Groundwater:

Water found underground that fills pores between materials such as sand, soil, or gravel. In aquifers, groundwater often occurs in quantities where it can be used for drinking water, irrigation, and other purposes.

Hazard Ranking System (HRS):

A numerical screening system used by EPA to evaluate the relative potential risks to public health and the environment from releases or threatened releases of hazardous substances from contaminated sites. Data from preliminary site investigations is used to develop a site score from 0 to 100 indicating the potential for substances released in groundwater, air, surface water, or soil to affect people on or near the site. The HRS ranking is the principal factor used to determine if a site qualifies for the National Priorities List.

Health Consultation:

A review of available data by the ATSDR at EPA's request to determine if existing levels of contaminants and conditions at a site are creating a public health hazard that requires immediate action.

Information Repository:

The information repository is usually located in a public building that is convenient for local residents, such as a public school, city hall, or library, and contains current information, technical reports, reference documents, and other information regarding a

Superfund site. As the site proceeds through the remedial process, the file at the information repository is contractually updated.

National Priorities List (NPL):
A list generated by EPA depicting the uncontrolled or abandoned hazardous waste sites that are priorities for long-term remedial investigation (RI) and response. The list is based primarily on the score a site receives on the Hazard Ranking System. A non-federal site must be on the NPL to receive money from the Trust Fund for Remedial Action. Federal properties listed on the NPL do not receive money from the Trust Fund, but EPA takes a more formal role in the cleanup process. EPA is required to update the NPL at least once a year.

Potentially Responsible Party (PRP):
An individual, company, or group of companies that may have contributed to the hazardous conditions at a site. These parties may be held liable for costs of the remedial activities by EPA through CERCLA laws.

Preliminary Assessment:
The process of collecting and reviewing available information about a known or suspected hazardous waste site or release status.

Proposed Plan:
A public participation requirement of CERCLA in which EPA and/or the PRP summarize for the public the preferred cleanup strategy, rationale for the preference, and alternatives presented in the detailed analysis of the RI/FS. The proposed plan may be prepared as a fact sheet or a separate document. In either case, it must actively solicit public review and comment on all alternatives under consideration.

Public Comment Period:
The time in which the public can review and comment on various documents. A 30-day minimum comment period is held to allow the community to review and comment on the document.

Record of Decision (ROD):
A ROD provides the justification for the cleanup remedial action (treatment) chosen at a Superfund site. It also contains site history, site description, site characteristics, community participation, enforcement activities, past and present activities, contaminated media, the contaminants present, scope and role of response action, and the remedy selected for cleanup.

Remedial Action:
The actual construction or implementation phase that follows the remedial design of the selected cleanup alternative at a CERCLA site.

Appendix J
Glossary (Continued)

Remedial Design:

An engineering phase that follows the ROD when technical drawings and specifications are developed for subsequent remedial action at a CERCLA site.

Remedial Investigation (RI):

A study designed to collect the data necessary to determine the nature and extent of contamination at a site.

Responsiveness Summary:

A summary of oral and written comments received by EPA during a public comment period on key site-related documents, with EPA's responses to those comments. The responsiveness summary highlights community concerns to be taken into account by EPA in making decisions on a site and is a key part of the ROD.

Risk Assessment:

An evaluation of the likelihood of exposure and potential magnitude of future health or environmental effects that could occur if no cleanup action is taken on a site. Risk assessment may include both qualitative (non-numerical) evaluation and quantitative (numerical) calculations based on specific assumptions about long-term exposure risks. Ecological risk assessment applies to animals, fish, vegetation, and other environmental receptors. Human health risk assessment estimates the potential effects on people. Risk assessment results are used to identify site cleanup requirements.

Superfund:

The trust fund established under CERCLA to pay for cleanup of abandoned hazardous waste sites if PRPs cannot be identified. Superfund is the common name for CERCLA and is often used as an adjective for hazardous waste sites and the investigation and cleanup process directed by EPA.

Superfund Amendments and Reauthorization Act of 1986 (SARA):

SARA established standards for cleanup activities and stipulates the conditions for offsite disposal of wastes. The amendments also clarified many public participation questions and made federal facilities accountable under the statute.

Technical Assistance Grant (TAG)

The purpose of the Technical Assistance Grant is to increase the level of understanding and participation in the Superfund process among community members and provide independent technical review of Site documents. As part of the Administrative Order by Consent, a grant in the amount of $50,000 is awarded to a community group (that is directly affected by the Superfund Site) that is responsible for hiring and managing a Technical Advisor, to assist the affected community. The community group is also responsible for disseminating information to additional stakeholders or other affected communities.

Appendix J
Glossary (Continued)

United States Environmental Protection Agency (EPA):
Established in 1970 to bring together parts of various government agencies involved with the control of pollution.

Appendix L
Summary of Public Involvement and Outreach
Appendix K
Demographic Information

People Quick Facts	Alachua County	Florida
Population, 2009 estimate[1]	243,574	18,537,969
Population, percent change, April 1, 2000 to July 1, 2009	11.8%	16.0%
Population estimates base (April 1) 2000	217,955	15,982,839
Persons under 5 years old, percent, 2008	5.7%	6.2%
Persons under 18 years old, percent, 2008	18.7%	21.8%
Persons 65 years old and over, percent, 2008	10.5%	17.4%
Female persons, percent, 2008	50.7%	50.9%
White persons, percent, 2008	73.7%	79.8%
Black persons, percent, 2008	19.5%	15.9%
American Indian and Alaska Native persons, percent, 2008	0.3%	0.5%
Asian persons, percent, 2008	4.6%	2.3%
Native Hawaiian and Other Pacific Islander, percent, 2008	0.0%	0.1%
Persons reporting two or more races, percent, 2008	1.8%	1.4%
Persons of Hispanic or Latino origin, percent, 2008	7.4%	21.0%
White persons not Hispanic, percent, 2008	66.9%	60.3%

[1] According to the University of Florida Bureau of Economic and Business Research, the 2009 population for Alachua County is estimated to be 256,232 with approximately 107,260 residents living within unincorporated areas.

Appendix L
Summary of Public Involvement and Outreach

Business QuickFacts	Alachua County	Florida
Private nonfarm establishments, 2007	5,991	523,461
Private nonfarm employment, 2007	87,130	7,425,331
Private nonfarm employment, percent change 2000-2007	7.0%	19.4%
Non-employer establishments, 2007	15,465	1,618,119
Total number of firms, 2002	17,163	1,539,207
Black-owned firms, percent, 2002	5.0%	6.6%
American Indian and Alaska Native owned firms, percent, 2002	0.0%	0.6%
Asian-owned firms, percent, 2002	2.5%	2.7%
Native Hawaiian and Other Pacific Islander owned firms, percent, 2002	0.0%	0.1%
Hispanic-owned firms, percent, 2002	5.6%	17.3%
Women-owned firms, percent, 2002	29.5%	28.4%

Appendix L
Summary of Public Involvement and Outreach

Date	Event	Subject
8/2007-5/2010	Collaborative FS	FDEP, Beazer East, EPA begin a series of 6 face-to-face meetings preparing Feasbility Study documents for review and comment by Gainesville Local Implementation Team (LIT) in iterative stakeholder process
11/17/2007	Koppers Citizen Advisory Meeting	EPA representatives participate in Koppers Site quarterly meeting with interested community who participate in plant meetings
4/2008	EPA Awards ACEPD Grant	EPA Region 4 awards Alachua County EPD a $108,000 grant to study creek sediments and stormwater runoff at the Koppers facility and former Cabot Carbon lagoons
5/1/2008	Joint Gainesville City/Alachua County Commission Meeting	Provide updates related to Site remedial investigations/interim remedial measures, redevelopment possibilities, soil cleanup levels. Took questions from Commissioners and general public See it online at the City of Gainesville website, Commission Meetings Online
3/9/2009	Gainesville City Commission Special Meeting	Provide information related to land use and soil cleanup standards at Superfund Sites. Took questions/received feedback from Commissioners and general public See it online at the City of Gainesville website, Commission Meetings Online
6/11/2009	EPA Public Availability Session	EPA, FDOH, Alachua County DOH, and Beazer East representatives provide face-to-face information to members of the public to discuss soil sampling data results obtained nearby the former Koppers plant
7/2009	Koppers Site Video	Community Involvement Coordinator and RPM provide a guided tour of the operating Koppers Site and discuss specific operations and cleanup at the Site. A Bob Safay Production. See it at: http://www.epa.gov/region4/waste/npl/nplfln/koppers_video.html
8/31/2009	Public Release of Draft Collaborative Feasibility Study	Release of Draft Feasibility Study to public, document results of 6 face-to-face meetings with FDEP, Beazer East, and EPA with input from the Local Implementation Team (LIT)
11/23/2009	Meeting at EPA Region 4 with LIT, Gainesville	Face-to-Face Meeting to discuss LIT concerns with draft FS with EPA and FDEP representatives

	City/Alachua County Elected Officials	
1/27/2010	Gainesville Commission Meeting	EPA personnel address questions related to December 2009 Koppers Site shutdown
1/6/2010	Administrator Meiburg Meets With Mayor Hanrahan	Senior Management meeting with Mayor to discuss City concerns and path forward for proposed plan
3/26/2010	Reuse Public Meetings	Pursuant to public request, EPA contractor E^2 conducts three meetings without presence of federal, state, local, and city personnel to engage in discussion of possible site reuses.
4/29/2010	Gainesville City Commission Meeting	EPA personnel provide updates on several interim remedial measure development and takes feedback/questions from the public See it online at the City of Gainesville website, Commission Meetings Online
6/1/2010	Technical Assistance Grant Award	EPA awards Protect Gainesville Citizens technical assistance grant
6/14/2010	Reuse Public Meeting	EPA reuse contractor E^2 meet with members of the public to discuss their ideas related to possible former Koppers Site reuse
6/15/2010	Koppers Site Tour	EPA and Beazer East representatives provide Site tour to interested public and take feedback on possible drums buried onsite eyewitnesses. Remedial design workplan for further submitted based on testimonials received
8/1-3/2010	Community Interviews	Community Interviews in preparation for Community Involvement Plan update
8/5/2010	Proposed Plan Meeting	EPA representatives present Koppers proposed plan and take public comments/answer questions for 3 hours
8/16/-9/15/2010	Draft Community Involvement Plan Public Notice	Updated Community Involvement Plan public-noticed in Gainesville Sun
8/17/2010	Koppers Site Tour	EPA an Beazer East representatives provide a Site tour to discuss Site demolition efforts to remove Site structures, implement an interim remedial measures for stormwater management and dust control measures
9/23/2010	Meeting with LIT in Tallahassee to Discuss EPA	EPA, FDEP, and Beazer East representatives meet with LIT members to discuss EPA's proposed plan and local technical concerns

Appendix L
Summary of Public Involvement and Outreach

	Proposed Plan Elements	
10/6/2010	EPA Public Availability Session	EPA, FDOH, FDEP, Alachua County DOH, and Beazer East representatives provide information related to contents of EPA proposed plan and answer specific questions that members of the public have related to Koppers
11/3/2010	EPA Five-Year Review Interviews	EPA personnel interviewed Mayor Lowe and four City Commissioners for the 2011 Five-Year review
11/4/2010	Five-Year Review Site Walk and Gainesville Stakeholder Five-Year Interviews	Interviewed Gainesville stakeholder representatives from the GRU, ACEPD, the City of Gainesville Public interest groups the Stephen Foster Neighborhood Association, the Stephen Foster Neighborhood Protection Group, BANCCA, and the Protect Gainesville Citizens TAG recipient, Seven individual residents that live nearby the former Koppers Site
11/16/2010	FDOH/EPA Indoor Dust Sampling Workgroup	Community members, FDEP, FDOH, ACEPD, CDC representatives begin discussions of possible approaches to sampling indoor dust for presence of possible Site-related contaminants
12/2/2010	FDOH/EPA Indoor Dust Sampling Workgroup	Community members, FDEP, FDOH, ACEPD, CDC representatives continue discussions of possible approaches to sampling indoor dust for presence of possible Site-related contaminants
1/12/2011	FDOH/EPA Indoor Dust Sampling Workgroup	Community members, FDEP, FDOH, ACEPD, CDC representatives continue discussions of possible approaches to sampling indoor dust for presence of possible Site-related contaminants
2/2/2011	RA Conference Call with City of Gainesville Alachua County Elected Officials	Regional Administrator and technical staff provide a briefing to City of Gainesville, Alachua County elected officials and technical representatives, Protect Gainesville Citizens TAG technical advisor on ROD issuance, next steps.
2/2/2011	**ROD Issued**	**Press release and ROD summary issued on website.**
2/15/2011	Gainesville Stakeholder Conference Call	ACEPD, FDEP, City of Gainesville, GRU, PRP Beazer East and Cabot Carbon technical representatives discuss ROD contents, next steps including consent decree negotiations.
3/8/2011	PGC Technical Advisor	Shared draft workplan documents for offsite soil sampling, buried drum remedial investigation, and held conversations related to Site cleanup efforts and PGC concerns
3/18/2011	FDOH/EPA Indoor Dust	Community members, FDEP, FDOH, ACEPD, CDC representatives continue discussions of possible approaches to

	Sampling Workgroup	sampling indoor dust for presence of possible Site-related contaminants
3/24/2011	Former Koppers Site Walk	Review stormwater improvements, completed site demolition results and provide information on upcoming remedial actions.
4/8/2011	FDOH/EPA Indoor Dust Sampling Workgroup	Community members, FDEP, FDOH, ACEPD, CDC representatives continue discussions of possible approaches to sampling indoor dust for presence of possible Site-related contaminants
4/19/2011	Gainesville Stakeholder Conference Call	ACEPD, FDEP, City of Gainesville, GRU, PRP Beazer East and Cabot Carbon technical representatives discuss workplans for offsite soil sampling plan, remedial design documents, and buried drum remedial investigation.
4/29/2011	FDOH/EPA Indoor Dust Sampling Workgroup	Community members, FDEP, FDOH, ACEPD, CDC representatives continue discussions of possible approaches to sampling indoor dust for presence of possible Site-related contaminants

Remedial Action Milestones Since 2/2/2011 ROD Issuance

Date	Item	Description
4/14/2011	Special notice letter issued to Beazer East	Issuance of special notice letter to Beazer East begins consent decree negotiations for conducting the remedial design/remedial action for Koppers portion of the Site
Completed 4/1/2011	Creek sediment removal action	116 tons of contaminated sediment were removed and replaced with clean sediment in Hogtown and Springstead Creeks