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March 1, 2006

Ms. Amy McLaughlin
Remedial Project Manager
U.S. Environmental Protection Agency
Region IV, Superfund North Florida Section
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Subject: Beazer's Response to February 28, 2006 ACEPD Comments on the Initial Water Quality Results for Transect Wells , Koppers Inc. Site Gainesville, Florida

Dear Ms. McLaughlin:

On behalf of Beazer East Inc. (Beazer), we are in receipt of Alachua County Environmental Protection Department (ACEPD) comments in the letter to the U. S. Environmental Protection Agency (EPA) entitled "*ACEPD Comments on Beazer Report on Initial Laboratory Water Quality Results Transect Wells FW-10B through FW-16B Cabot Carbon/Koppers Superfund Site (February 10, 2006)*". GeoTrans is in agreement with many of the suggestions and have already planned to implement most of these changes in the next groundwater sampling event scheduled for March 1, 2006. The following is our response to each of the comments (the introductory sentence for each of the comments has been included for reference):

ACEPD Comment #1 – "*No Matrix Spike and Matrix Spike duplicate (MS/MD) samples were analyzed with this data se for determination of acidic and base-neutral analytes by method 8270C...*"

Response -- We concur with this comment. Sufficient sample volumes will be collected to allow for MS/MD analyses on 5 percent of the samples.

ACEPD Comment #2 – "*High bromide concentrations in FW-10B-1, FW12B-1 and FW-16B-1 may indicated that these wells were not adequately over-pumped/developed for bromide reduction before sampling...*"

Response -- We concur with this comment. GeoTrans had previously planned to perform additional development in the upper zone for these three wells prior to the collection of confirmation samples in select wells during the March 1, 2006 sampling event.

ACEPD Comment #3 – *“The low and “outside the control limits” surrogate recoveries for the phenol-d6 (6% recovery) and 2-Fluorophenol (3% recovery) obtained in FW 14B-4 suggest continuing quality control problem for the phenolic analysis in these samples...”*

Response -- We concur with this comment. Beazer has previously responded to this comment in a February 1, 2006 letter from RETEC to Beazer. This letter was provided to Stakeholders via email on February 6, 2006. The February 1, 2006 RETEC letter states: *“..although the emulsion (when present) prevents the migration of the surrogates to the organic phase for measurement, it apparently does not prevent the migration of the constituents of interest, as their presence/concentrations remain consistent regardless of the presence or absence of the emulsifying agent”*. As an additional effort to try and minimize this issue, Beazer has requested that the laboratory re-analyze samples that form an emulsion. Prior to the re-analysis, the samples will be filtered in an attempt to eliminate suspended sediments that have been hypothesized to be the source of the emulsion.

ACEPD Comment #4 – *“The QAPP for the site requires collection and analysis of both equipment rinsate blanks and field blanks...”*

Response -- We concur that additional equipment rinsate blank samples should be collected; however, the frequency of collection proposed by the ACEPD is excessive, since approximately 1 day is required to sample each well. The proposed frequency of collection would result in one rinsate blank per well. GeoTrans proposes the collection of equipment rinsate blanks at the rate of one blank for every three wells sampled. This will result in two equipment rinsate blank samples during each six well sampling program.

ACEPD Comment #5 – *“The QAPP for the site requires collection and analysis of field duplicates at a frequency of 10%...”*

Response -- We concur with this comment. Field duplicates will be collected at a frequency of 10 percent.

ACEPD Comment #6 – *“Field calibration results must be documented...”*

Response -- Beazer has previously responded to this comment in a memorandum dated January 30, 2006 that was emailed to ACEPD on January 31, 2006. GeoTrans plans to utilize the same model Horiba U-22 field meter for collecting field measurements of the purged water. This meter utilizes one calibration solution for all field parameters and does not require routine replacement of the calibration fluid. All measurements are made on excess sample water after it has been removed from the well; hence, cross contamination from the probe is not an issue. The reciprocating action of the Waterra pump results in highly disturbed, oxygenated water. Because of this measurements of DO and ORP are not

representative of formation conditions and are of limited use. One change from our previous field calibration procedure is that GeoTrans will manually record the calibration values for each field parameter on a field form for future reference.

ACEPD Comment #7 – *“Chemical stability monitored during purging with the Waterra pump must meet acceptable quality assurance objectives...”*

Response – GeoTrans concurs with this comment. Prior to the installation of the Westbay system, the wells are developed by pumping between 3 and greater than 10 times the volume of water injected during drilling. Bromide and turbidity measurements are performed to document stabilization of these parameters. After the installation of the Westbay system, an additional minimum of three well volumes are purged from each of the four screened intervals. In addition, field parameters consisting of pH, temperature, and specific conductance are measured. Dissolved oxygen, ORP and turbidity are measured; however, as stated above, the use of dissolved oxygen and ORP is of limited value because agitation induced by the Waterra pump and turbidity can vary with the rate of groundwater extraction from the well. The very low flow rate induced by the Westbay system will not result in turbid groundwater samples. The combination of the initial development and final purging ensures representative samples of the Floridan Aquifer.

ACEPD Comment #8 – *“Analyses for arsenic, chromium, copper and zinc are reported as “total dissolved metals” in the analytical report...”*

Response – GeoTrans concurs with this comment. The initial sample analysis was performed for total metals to investigate potential naturally occurring arsenic sources in the Floridan Aquifer. Future samples will be analyzed for dissolved metals.

ACEPD Comment #9 – *“The full suite of compounds set forth in EPA methods 8260 and 8270 should be reported for all samples analyzed...”*

Response – GeoTrans does not concur with this comment. The only constituents that are essential to “a comprehensive understanding” of the Site are constituents that are likely to be associated with the Site. It is not Beazer’s responsibility to analyze and report constituents not associated with the Site. The 1990 Record of Decision (ROD) for the Cabot Carbon/Koppers Superfund Site lists the constituents of concern identified for groundwater. In addition, Table 2 in the 2004 Floridan Aquifer Monitoring Plan (TRC, June 2004) lists the constituents to be monitored in Floridan Aquifer groundwater for the Site. Table 2 in the TRC (2004) monitoring plan includes all constituents listed in the 1990 ROD in addition to other constituents that were voluntarily added by Beazer. The constituents that are currently being reported are consistent with both the 1990 ROD and the Floridan Aquifer Monitoring Plan (TRC, 2004). We will continue to report Site-specific constituents as described in these documents.

ACEPD Comment #10 – *“The existing QAPP for the site must be revised...”*

Response – GeoTrans concurs with this comment. The existing QAPP was written for the existing monitoring network and does not address a Westbay type system. As such, the QAPP is currently being updated for the new UF wells with procedures for sampling a Westbay system.

Sincerely,



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Principal Hydrogeologist

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