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February 2, 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 Comments on the GRU Team November 2, 2005 Report entitled "Cabot Carbon/Koppers Superfund Site Technical Memorandum Number 2: Evaluation of the Capture Effectiveness of the Ground Water Extraction System at the Koppers, Inc. Site, Gainesville, Florida"

Dear Ms. McLaughlin:

On behalf of Beazer East Inc. (Beazer), GeoTrans would like to acknowledge receipt of the Gainesville Regional Utilities', Waterloo Hydrogeologic, Inc.'s and the GRU Expert Panel's (collectively the GRU Team) second analysis of the October 2004 GeoTrans fate and transport model of the Koppers Inc. site ("Site") in Gainesville, Florida (GeoTrans Model). A memorandum was submitted to the U. S. Environmental Protection Agency (EPA) on November 2, 2005 and is entitled "*Cabot Carbon/Koppers Superfund Site Technical Memorandum Number 2: Evaluation of the Capture Effectiveness of the Ground Water Extraction System at the Koppers, Inc. Site, Gainesville, Florida*" (Tech Memo #2).

Tech Memo #2 discusses GRU Team model simulations that utilized particle tracking to evaluate the performance of the Surficial Aquifer hydraulic-containment system. GeoTrans performed a preliminary evaluation of the potential effectiveness of the hydraulic-containment system with the fate and transport model developed by GeoTrans for the Site (GeoTrans, October 5, 2004). In GeoTrans' letter to the EPA/Stakeholders dated February 23, 2005, we clearly state in the Attachment 3 Response to the Florida Department of Environmental Protection (FDEP) Comment 1:

*"The GeoTrans Site Model indicates that the hydraulic barrier system for the Surficial Aquifer may not be 100-percent effective in capturing all groundwater flowing across the eastern and northern property boundaries. The Site Model demonstrates that the majority of the organic constituents that are not captured by the KI containment system are subsequently captured by the Cabot Carbon horizontal drain system...Beazer will address the Surficial Aquifer containment system issue as part of the Site-wide Feasibility Study"*

In addition, Beazer has stated in their semi-annual report, Section 2 Groundwater Containment System Performance Monitoring, Page 2-1 (RETEC, March 2004) that:

*“..Beazer contracted GeoTrans, Inc. (GeoTrans) (one of Beazer’s investigation and remediation consultants) to perform a comprehensive evaluation of all groundwater and constituent transport data. Included in this evaluation was the development of a three-dimensional fate and transport model (the Site Model) that more accurately simulates groundwater flow and constituent transport at the Site (GeoTrans Inc. 2004). Results from the Site Model simulations indicate that the hydraulic-containment system may not be 100-percent effective in capturing Surficial Aquifer groundwater flow from the Site. The Site Model also demonstrates that constituents that are potentially bypassing the containment system are either captured by the Cabot Carbon containment system or naturally attenuated within a short distance downgradient of the Site.”*

Similar statements are included in the semi-annual reports for 2005 (RETEC, December 2004; RETEC, March 2005; and RETEC, November 2005).

As stated in Beazer’s December 29, 2005 response to U.S. EPA, we disagree with the misleading statements and conclusions made in the June 5, 2005 GRU Team report and cover letter concerning constituent transport rates and distances. Tech Memo #2 continues to perpetuate these misleading statements and conclusions.

In summary, the particle-tracking analysis, detailed in Tech Memo #2, provides limited additional information concerning the effectiveness of the hydraulic-containment system. Beazer has previously indicated in four reports and a letter submitted in 2004 and 2005 that the Surficial Aquifer hydraulic-containment system may not be 100-percent effective and that a comprehensive evaluation of this system and the Site-wide groundwater remedy will be performed as part of the Site-wide Feasibility Study.

Sincerely,



James R. Erickson, P.G.  
Principal Hydrogeologist

cc: B. O’Steen, U.S. EPA  
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