

April 11, 2016

VIA EMAIL

Rusty Kestle Remedial Project Manager Superfund Remedial Branch, Section C U.S. Environmental Protection Agency, Region 4 61 Forsyth Street SW Atlanta, GA 30303-8909

Subject: March 2016 Monthly Progress Report

Dear Mr. Kestle :

On behalf of Beazer East, Inc. (Beazer), attached is the March 2016 Monthly Progress Report for the Koppers portion of the Cabot/Koppers Superfund Site in Gainesville, Florida. If you have any questions or comments, please contact me.

Sincerely,

Gregory W. Council, P.E. Principal Engineer

Kelsey Helton, FDEP CC: Robin Hallbourg, ACEPD Agustin (Gus) Olmos, ACEPD Kristie Williams, City of Gainesville Yvette Carter, City of Gainesville Rick Hutton, GRU Carrie McCoy, Black & Veatch Josh Hayes, J.M. Waller John Herbert, GeoHydro Consultants Patricia Cline Linda Paul, Koppers, Inc. Mitchell Brourman, TRMI Mike Slenska, TRMI Donna Kopach, TRMI Jim Erickson, Tetra Tech Wayne Reiber, Cabot Corporation Steve Clark, FTS John Helton, FTS Claire Marcussen, Skeo, Community Technical Advisor

March 2016 MONTHLY PROGRESS REPORT Cabot/Koppers Superfund Site Gainesville, Florida

1. Compliance Actions:

- Beazer's Operation and Maintenance (O&M) Contractor performed routine treatment plant O&M services for the groundwater extraction and pretreatment system.
- Remedial Design and Remedial Action activities are presently being conducted.

2. Sampling/Test Results and Data:

- Instantaneous flow rates and totalizer volumes were measured in each extraction well.
- NAPL recovery was restarted in the Process Area in November following ISGS injections. The data are currently being analyzed and will be transmitted separately.
- A total of 4,148,719 gallons of groundwater were recovered by the Surficial Aquifer drains and extraction well system (both Surficial Aquifer and UFA) during the past month (system run time of 744 hours). The average recovery rate for the month was approximately 92.9 gallons per minute (gpm). The recovery for each component is listed below.
 - Surficial Aquifer
 - Perimeter Extraction Wells: 597,660 gallons
 - Former North Lagoon Drain: 480,850 gallons
 - Former Drip Track Drain: 479,040 gallons
 - Former Process Area Drain: 448,710 gallons
 - Former South Lagoon Drain: 477,100 gallons
 - Upper Floridan Extraction Wells
 - FW-6: 23,023 gallons
 - FW-21B: 146,883 gallons
 - FW-31BE: 983,020 gallons
 - FW-32BE: 512,433 gallons

Approximately 383.3 million gallons have been recovered from the Surficial Aquifer extraction wells and four drains since the start of the Surficial Aquifer containment system in January 1995.

For the month, the total volume of water treated and discharged to the GRU wastewater system was measured to be 2,418,000 gallons. A portion of the water, from Upper Floridan Aquifer wells, was treated and used for on-Property irrigation.

The Former South Lagoon groundwater drain pumps were turned off for approximately 9 hours to pump and clean clarifiers and to treat backwash water.

3. Plans, Reports, Deliverables and Procedures Completed:

- Quality Assurance Project Plan for Groundwater Monitoring (Revision 2) submitted March 9, 2016.
- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) March 15, 2016.
- Revised Former South Lagoon Preliminary Design and Design Investigation Workplan submitted March 22, 2016.
- Phase II Field Implementation of In-Situ Geochemical Stabilization Remediation for the Former Process Area submitted March 29, 2016.

- Periodic maintenance checks and inspections.
- Treatment-plant component maintenance and repair as needed (caustic pump, carbon vessel gaskets and gauges, sludge pump diverter valve, bag filter vessel).
- Irrigation Breakthrough sampling on March 15, 2016.
- Carbon A and Carbon C sampling on March 16, 2016.
- Cleaned EW-1 flow meter and shocked EW-1, replaced EW-1 pump.
- Cleaned EW-14 flow meter and pump.
- Cleaned EW-3 flow meter and pump.
- Shipped 5 drums PPE, 27 drums treatment sludge, 29 drums drilling mud, 5 drums DNAPL, and 7 drums non-hazardous soil on March 2, 2015.
- On-property irrigation using treated groundwater from FW-6, FW-21B, FW-31BE, and FW-32BE.

4. Upcoming Actions:

- NAPL collection at Upper Hawthorn monitoring wells: bi-weekly.
- NAPL collection at temporary Upper Hawthorn ISGS injection points: bi-weekly.
- NAPL collection in Process Area: bi-weekly.
- Routine inspection, operation, maintenance, and monitoring.
- Second quarter sampling event: May 9-13, 2016.

5. Schedule Status:

• Minor modifications were made to the project schedule.

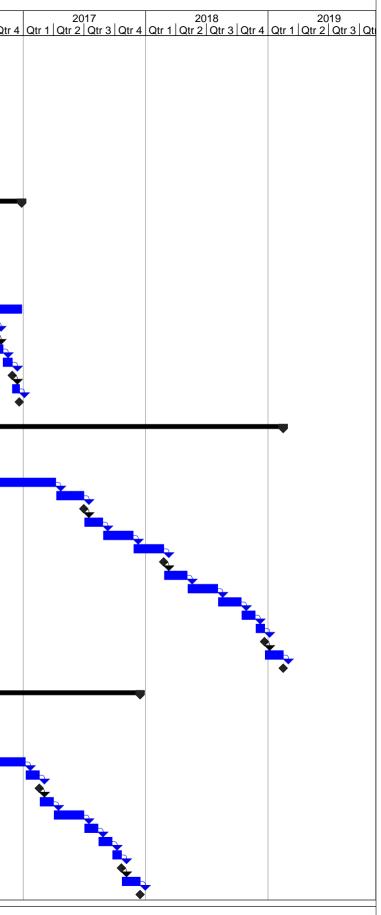
6. Community Involvement:

• Future community involvement activities will be coordinated with EPA.

					GAINESVIL	LE REMEDIAL	DESIGN				
ID	WBS Task Name	Duration Predecessors	Start	Finish		2013	2014	2015	2016	2017	2018 2019 Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qtr 1 Qtr 2 Qtr
1	1 Consent Decree for RD/RA	23.8 wks	Thu 2/7/13	Wed 7/24/13		r 2 Qtr 3 Qtr 4	4 Qtr 1 Qtr 2 Qtr 3 Qtr 4	Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qtr	Qtr 2 Qtr 3 Qtr 4	Qtr 1 Qtr 2 Qtr 3 Qtr 4	Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qtr 1 Qtr 2 Qt
2	1.1 US DOJ Lodges Donsent Decree with Court	0 days	Thu 2/7/13			•					
3	1.2 Public Comment on Consent Decree	4.6 wks	Wed 2/13/13	Fri 3/15/13							
4	1.3 Beazer Submittal: Project Coordinators, Supervising Contractor, Quality Management Plan	0 days	Fri 2/15/13	Fri 2/15/13	8 ◆						
5	1.4 Court Enters Consent Decree Final	0 days	Tue 7/9/13	Tue 7/9/13	8						
6	1.5 EPA Issues Authorization to Proceed with Remedial Design	0 days		Wed 7/24/13		•					
7											
8	2 Remedial Design Work Plan (RDWP)	22.3 wks		Thu 12/26/13			•				
9	2.1 Prepare RDWP 2.2 Beazer Submit RDWP	43 days 6	Wed 7/24/13 Fri 9/20/13								
10	2.2 Beazer Submit RDWP 2.3 EPA Review and Comment RDWP	0 wks 9 6.8 wks 10	Mon 9/23/13								
12	2.4 Beazer Respond to Comments	4.3 wks 11		Mon 12/9/1							
13	2.5 Beazer Submit Responses and RDWP Version 2	0 wks 12		Mon 12/9/13							
14	2.6 EPA Review	2.6 wks 13		Thu 12/26/13							
15	2.7 EPA Approval RDWP	0 wks 14	Thu 12/26/13	Thu 12/26/13	8						
16											
17	3 Supporting Plans for RD/RA	100.8 wks		Thu 8/27/1							
18	3.5 Beazer Submit Health & Safety Plan	0 wks 10	Fri 9/20/13			◆ [*]					
19 20	3.2 Materials Management Plan 3.6 Stormwater Management Plan	5 wks 10 5 wks 19FF	Tue 4/1/14 Tue 4/1/14								
20	3.7 Noise and Dust Control Plan	5 wks 19FF	Tue 4/1/14 Tue 4/1/14								
22	3.5 Equipment Decontamination Plan	5 wks 19FF	Tue 4/1/14								
23	3.6 Beazer update QAPP	33.8 wks	Mon 1/5/15				· · ·				
24	3.7 Beazer Submit Revised QAPP	0 wks 23	Thu 8/27/15	Thu 8/27/1	5			▲			
25											
26	4 Off-Property Soil Replacement (OU-5): DESIGN TRACK #1	121.4 wks		Thu 8/27/1							
27 28	4.1 Initial Identification of Remediation & Evaluation Parcels 4.2 Obtain Access Agreements for Surveys & Sampling	0 wks 23 wks		Tue 4/30/13 Wed 10/9/13							
20	4.3 Community Information Session	0 wks		Thu 5/30/13							
30	4.4 Sampling for Refinement of Remediation Parcels (July 2013)	18.8 wks		Wed 11/27/13		·					
31	4.4.1 Proposal for Sampling (July 2013)	0 wks	Fri 7/19/13	Fri 7/19/13	1						
32	4.4.2 EPA Approval of Sampling	0 wks		Mon 7/22/13							
33	4.4.3 Sample Collection	2 days		Wed 7/31/13		Ь					
34	4.4.4 Analysis and Validation	6.2 wks 33		Thu 9/12/13							
35	4.4.5 Data Summary Report	10.8 wks 34		Wed 11/27/13							
36	4.4.6 Beazer Submit Data Summary and Fingerprinting Report 4.5 Pilot Home Soil Replacement	0 wks 35	Wed 11/27/13	Wed 11/27/13 Fri 12/6/13		•					
37 38	4.5 Pilot Home Soil Replacement 4.5.1 Survey	10.3 wks		Tue 10/8/1							
39	4.5.2 Design & Interview	3 wks 38		Tue 10/29/1							
40	4.5.3 Borrow Sampling	2 wks		Wed 10/23/13							
41	4.5.4 Sample Analysis	2 wks 40	Thu 10/24/13	Wed 11/6/13	3						
42	4.5.5 Pilot Plan	6 wks		Wed 11/6/13							
43	4.5.6 Submit Pilot Plan	0 wks 42,41	Wed 11/6/13	Wed 11/6/13 Wed 11/13/13	5						
44	4.5.7 Review 4.5.8 EPA Approval of Pilot Plan	1 wk 43 0 wks 44	Wed 11/1/13								
45	4.5.9 Permitting	2 wks 45FF	Thu 10/31/13								
	4.5.10 Pilot Implementation	3.3 wks 46,45	Thu 11/14/13			1					
48	4.6 Blocks A-I Remediation Design	42.4 wks	Mon 9/16/13	Tue 7/8/14							
49	4.6.1 Remedial Design Details	12.4 wks 35	Thu 11/28/13								
50	4.6.2 Submit RD Details	0 wks 49	Fri 2/21/14								
51 52	4.6.3 Review and Comment 4.6.4 Surveying & Interviews	0.8 wks 50 34 wks	Mon 2/24/14 Mon 9/16/13								
52	4.6.5 Parcel Designs & Remediation Agreements	28 wks	Mon 12/2/13								
54	4.6.6 Final Design and RAWP	19.6 wks	Fri 2/21/14								
55	4.6.6.1 Submit Pre-Final Designs & RAWP: Blocks G & H	0 wks	Fri 2/21/14	Fri 2/21/14							
	4.6.6.2 Final Design and RAWP Approval: Blocks G-H	1 wk 55	Fri 2/21/14				Ĭ				
	4.6.6.3 Submit Pre-Final Designs & RAWP: Blocks E&F	0 wks	Fri 3/7/14								
	4.6.6.4 Final Design and RAWP Approval: Blocks E&F	1 day 57	Fri 3/7/14								
	4.6.6.5 Submit Pre-Final Designs & RAWP: Block D 4.6.6.6 Final Design and RAWP Approval: Block D	0 wks 2 days 59	Thu 4/3/14 Thu 4/3/14								
	4.6.6.7 Submit Pre-Final Designs & RAWP: Block C	0 wks 59FF+4 wks		Wed 4/30/14							
	4.6.6.8 Final Design and RAWP Approval: Block C	0 wks 61		Wed 4/30/14							
	4.6.6.9 Submit Pre-Final Designs & RAWP: Block B	0 wks 61FF+3.1 wk									
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					GAINESVILLE REMEDIAL	DESIGN			
ID WBS	Task Name	Duration Predecessor	Start	Finish	2013	2014	2015 2016 Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qtr 1 Qtr 2 Qtr 3 Qtr	2017 4 Qtr 1 Qtr 2 Qtr 3 Qtr 4	2018 2019 Otr 1 Otr 2 Otr 3 Otr 4 Otr 1 Otr 2 Otr 3 Otr
64 6.6.10	Final Design and RAWP Approval: Block B	0.6 wks 63		Tue 5/27/14					
65 6.6.11	Submit Pre-Final Designs & RAWP: Block A	0 wks 63FF+3 wks		Thu 6/12/14		◀			
66 6.6.12	Final Design and RAWP Approval: Block A	0.6 wks 65		Tue 6/17/14		ľ			
67 6.6.13	Submit Pre-Final Designs & RAWP: Block I	0 wks 65FF+3.5 wk				₩			
68 6.6.14 69 4.7	Final Design and RAWP Approval: Block I Sampling for Refinement of Remediation Parcels (Feb 2014)	0.2 wks 67	Tue 7/8/14	Tue 7/8/14 Tue 8/12/14					
	Sampling for Kennement of Kennediation Farcers (Feb 2014)	24.0 WK5	Weu 2/15/14	Tue 0/12/14		•			
70 4.7.1	Beazer & EPA Sampling	0.2 wks		Wed 2/19/14		↓			
71 4.7.2		7.2 wks 70		Thu 4/10/14 Thu 7/31/14					
72 4.7.3 73 4.7.4	Data Summary Report Addendum Beazer Submit Report Addendum	16 wks 71 0 wks 72		Thu 7/31/14 Thu 7/31/14					
74 4.7.5	Call to discuss Report Addendum	0 wks 72		Tue 8/12/14		X			
75 4.8		12.2 wks		Mon 8/25/14					
76 4.8.1	Access Agreements for Design	2 wks		Fri 6/13/14					
77 4.8.2	Surveying & Interviews	5 wks 76	Mon 6/16/14						
78 4.8.3	Preliminary Design	5 wks 77SS+1 wk	Mon 6/23/14						
79 4.8.4	Pre-Final Design and Access	7 wks 78SS+1 wk	Mon 6/30/14						
80 4.8.5	RAWP: Block J	0 wks 1 wk 80	Fri 7/25/14	Fri 7/25/14 Thu 7/31/14		•			
81 4.8.6 82 4.8.7	Final Design & RAWP Approval: Block J RAWP: Block K	0 days 79		Wed 8/20/14					
83 4.8.8	Final Design and RAWP Approval: Block K	4 days 82		Mon 8/25/14					
84 4.9		16.4 wks		Tue 2/18/14					
85 4.9.1	Community Meeting: Landscaping Workshop - City (Oct 26)	2 days	Fri 10/25/13	Mon 10/28/13					
86 4.9.2	Community Meeting (Jan 18 2014)	2 days		Mon 1/20/14		I			
87 4.9.3	Community Meeting (Feb 18 2014)	0 wks		Tue 2/18/14		•			
88 4.10		39 wks 0 wks 88		Fri 11/14/14 Tue 11/18/14					
89 4.11 90 4.12		36.4 wks 88	Mon 11/17/14						
	Submit Implementation Report	0 wks 90		Tue 7/28/15		-			
	EPA Approval of Implementation Report	0 wks		Thu 8/27/15			•		
93									
	Cutoff Wall and Stormwater Controls: DESIGN TRACK #2	101.6 wks	Wed 12/17/14						
	Pre-Design Work Plan	21.2 wks 15	Wed 12/17/14			Ĩ			
	Submit Pre-Design Work Plan	0 wks 95		Wed 5/13/15					
97 5.3 98 5.4	Review and Comment Submit Response to Comments and Revised Plan	10 wks 96 0 wks 97FS+5.2 wk	Thu 5/14/15	Wed 7/22/15 Thu 8/27/15					
99 5.5		0 wks 98FS+0.2 wk							
	Pre-Design Investigation	32 wks	Mon 8/31/15				• • • • • • • • • • • • • • • • • • •		
101 5.6.1	Planning & Preparation	4 wks 99	Mon 8/31/15						
102 5.6.2	Field Work	11 wks 101		Fri 12/11/15					
103 5.6.3	Lab Work	20 wks 102FS-3 wks	Mon 11/23/15	Fri 4/8/16					
	Preliminary Design Submit Preliminary Design	5 wks 103FS-2 wks 0 wks 104	Fri 4/29/16						
	Review and Comment	4 wks 104	Mon 5/2/16						
	Pre-Final Design	5 wks 106	Mon 5/30/16						
108 5.11	Review and Comment	5 wks 107	Mon 7/4/16	Fri 8/5/16					
	Final Design	5 wks 108	Mon 8/8/16						
110 5.13		3 wks 109	Mon 9/12/16				🔖		
111 5.14 112 5.15	EPA Approval of Final Design Prepare RAWP	0 wks 110 8 wks 111	Fri 9/30/16	Fri 9/30/16 Fri 11/25/16					
	Submit RAWP	0 wks 112		Fri 11/25/16					
114			1111/20/10	1111/20/10					
	In-Situ Geochemical Stabilization (ISGS): DESIGN TRACK #3	202.7 wks	Thu 2/7/13	Tue 12/27/16					
116 6.1	Process Area	189.6 wks		Mon 9/26/16					
117 6.1.1	EPA Approval of ISGS Demonstration Work Plan (2012)	0 wks		Thu 2/7/13					
118 6.1.2		0 wks		Thu 2/7/13	•				
119 6.1.3 120 6.1.4	Characterization and DNAPL Recovery (began 2012) Characterization Report and Pilot Test Plan	32 wks 11.8 wks 119		Wed 9/18/13 Tue 12/10/13					
120 6.1.4		0 wks 120		Tue 12/10/13 Tue 12/10/13					
122 6.1.6	Review and Approval of Pilot Test Plan	10 wks 120	Wed 12/11/13						
123 6.1.7	Technical Working Group Meeting	0 wks	Wed 12/18/13						
124 6.1.8	Pilot Injection Testing	15 wks 122	Mon 3/17/14	Fri 6/27/14		V			
125 3.1.8.1	Pre-Pilot Testing & Chemical Delivery	1 wk		Fri 3/21/14		↓			
126 5.1.8.2	Pilot Injections	3 wks 125		Fri 4/11/14					
127 5.1.8.3	Borings in Injection Area	1 wk 126FS+10 w	Mon 6/23/14	Fri 6/27/14					
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ID	WBS T	ask Name	Duration	Predecessors	Start	Finish	2013 tr 4 Qtr 1 Qtr 2 Qtr 3 Qtr 4	2014 2tr 1 Qtr 2 Qtr 3 Qtr 4	2015 Qtr 1 Qtr 2 Qtr 3 Qtr	2016 4 Otr 1 Otr 2 Otr 3 Otr 4	2017 Qtr 1 Qtr 2 Qtr 3 Qtr 4	2018 Qtr 1 Qtr 2 Qtr 3 Qtr 4	2019 Qtr 1 Qtr 2 Q
192													
193	9 Ir	nstitutional Control	200.8 wks	;	Tue 7/9/13	Fri 5/12/17							
94	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13							
95	9.2	Submit ICIAP	0 wks	194	Fri 8/23/13	Fri 8/23/13							
96	9.3	Review	12.5 wks	195	Mon 8/26/13	Wed 11/20/13			<u> </u>				
197	9.4	Beazer Respond to Comments	60 wks	196	Mon 4/6/15	Fri 5/27/16							
198	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	197	Fri 5/27/16	Fri 5/27/16							
199	9.6	Review	3 wks	198	Mon 5/30/16	Fri 6/17/16							
200	9.7	EPA and FDEP Approval of ICIAP	0 wks	199	Fri 6/17/16	Fri 6/17/16							
201	9.8	Implement Beazer-Property Restrictive Covenant	47 wks	5	Mon 6/20/16	Fri 5/12/17							
202	9.8.1	Draft Proprietary Controls Package	13 wks	200	Mon 6/20/16	Fri 9/16/16							
203	9.8.2	Submit Draft Proprietary Controls Package	0 wks	202	Fri 9/16/16	Fri 9/16/16							
204	9.8.3	Review and Updating	8 wks	203	Mon 9/19/16	Fri 11/11/16							
205	9.8.4	Update Title Search and Prepare Public Notice	8 wks	204	Mon 11/14/16						L		
206	9.8.5	Beazer Publish Public Notice	0 wks		Fri 1/6/17	Fri 1/6/17							
207	9.8.6	Public Comment Period	4.4 wks		Mon 1/9/17	Tue 2/7/17							
208	9.8.7	Address Comments and Exectute Restrictive Covenant	5 wks	207	Wed 2/8/17	Tue 3/14/17							
209	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	208	Tue 3/14/17	Tue 3/14/17							
210	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	209	Wed 3/15/17	Fri 5/12/17							
211	9.8.10	Submit Final Proprietary Controls Package	0 wks	210	Fri 5/12/17	Fri 5/12/17					↓ ↓		

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