

April 11, 2016

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 VIA EMAIL

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

cc: Kelsey Helton, FDEP

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.

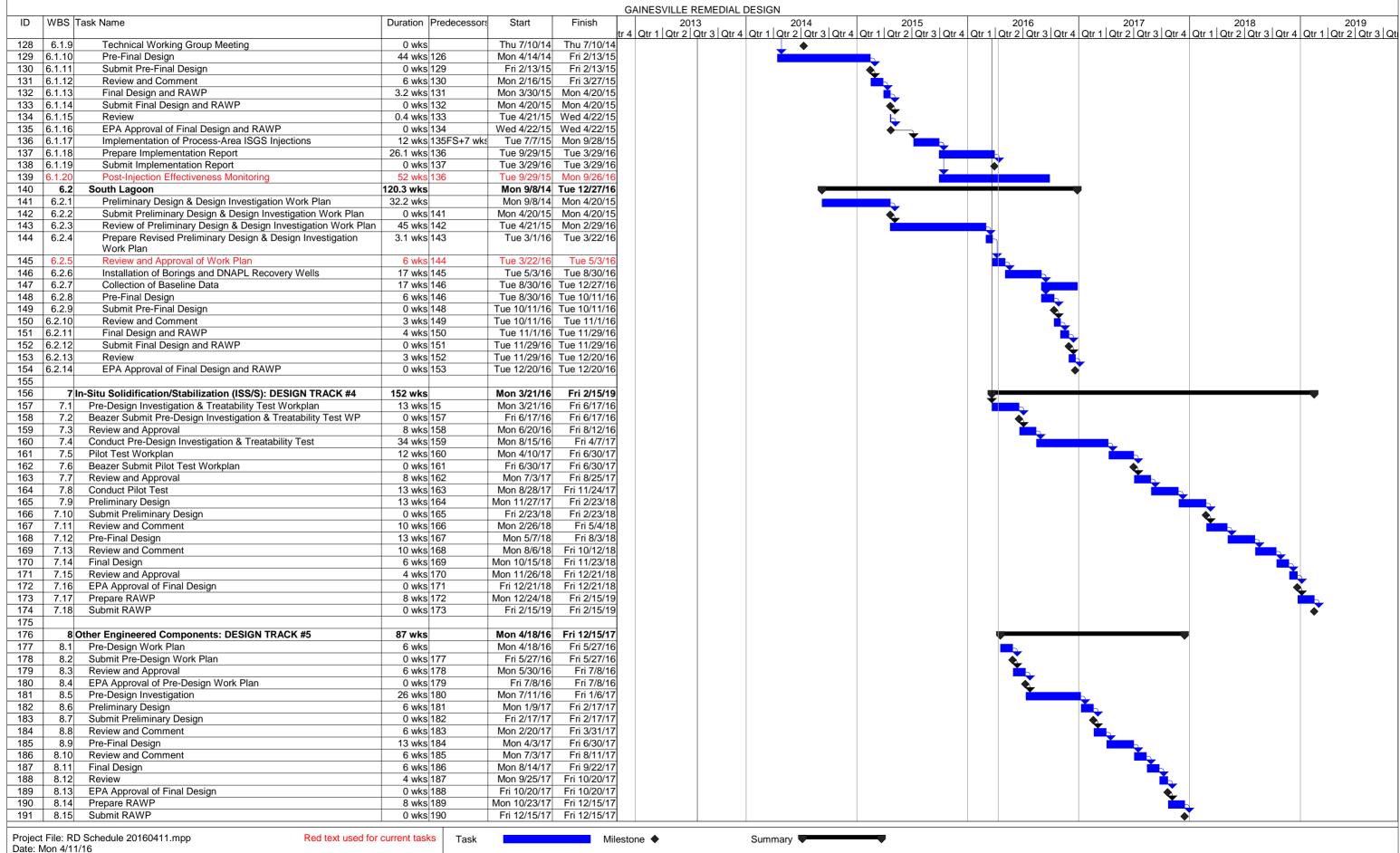
D 1445	OC T-	N. Nama	Duration Design	. Ct	Finial:	GAINESVILLE REMEDIAL DESIGN	
D WB	35   Tas	sk Name	Duration Predecessors	Start	Finish	2013 2014 2015 2016 2017 2017 2018 tr 4   Qtr 1   Qtr 2   Qtr 3   Qtr 4   Qtr 1   Qtr 2   Qtr	2019  Qtr 2   Ot
1	1 Coi	nsent Decree for RD/RA	23.8 wks	Thu 2/7/13	Wed 7/24/13	1/13	Qui Z   Qui
2 1		US DOJ Lodges Donsent Decree with Court	0 days	Thu 2/7/13			
3 1		Public Comment on Consent Decree	4.6 wks	Wed 2/13/13			
4   1		Beazer Submittal: Project Coordinators, Supervising Contractor,	0 days	Fri 2/15/13	Fri 2/15/13	/13	
		Quality Management Plan		/0//			
		Court Enters Consent Decree Final	0 days	Tue 7/9/13			
6 1 7	1.5	EPA Issues Authorization to Proceed with Remedial Design	0 days	wed 7/24/13	Wed 7/24/13		
	2 Rar	medial Design Work Plan (RDWP)	22.3 wks	Wed 7/24/13	Thu 12/26/13	<u>//3</u>	
		Prepare RDWP	43 days 6	Wed 7/24/13			
		Beazer Submit RDWP	0 wks 9	Fri 9/20/13			
		EPA Review and Comment RDWP	6.8 wks 10	Mon 9/23/13			
2 2		Beazer Respond to Comments	4.3 wks 11		Mon 12/9/13	<u>/13</u>	
3 2		Beazer Submit Responses and RDWP Version 2	0 wks 12	Mon 12/9/13	Mon 12/9/13	<u>/13</u>	
4 2		EPA Review	2.6 wks 13	Mon 12/9/13			
	2.7	EPA Approval RDWP	0 wks 14	Thu 12/26/13	Thu 12/26/13	/13	
6							
		pporting Plans for RD/RA	100.8 wks	Fri 9/20/13			
		Beazer Submit Health & Safety Plan	0 wks 10	Fri 9/20/13			
		Materials Management Plan	5 wks 10	Tue 4/1/14			
		Stormwater Management Plan  Noise and Dust Control Plan	5 wks 19FF 5 wks 19FF	Tue 4/1/14 Tue 4/1/14			
		Roise and Dust Control Plan  Equipment Decontamination Plan	5 wks 19FF 5 wks 19FF	Tue 4/1/14 Tue 4/1/14			
		Beazer update QAPP	33.8 wks	Mon 1/5/15			
		Beazer Submit Revised QAPP	0 wks 23	Thu 8/27/15			
5	-	200201 00011111 1011000 001111		5/21/10			
6	4 Off	-Property Soil Replacement (OU-5): DESIGN TRACK #1	121.4 wks	Tue 4/30/13	Thu 8/27/15	715	
7 4		Initial Identification of Remediation & Evaluation Parcels	0 wks		Tue 4/30/13		
8 4	4.2	Obtain Access Agreements for Surveys & Sampling	23 wks		Wed 10/9/13		
9 4		Community Information Session	0 wks	Thu 5/30/13	Thu 5/30/13	<u>√13</u>	
0 4	4.4	Sampling for Refinement of Remediation Parcels (July 2013)	18.8 wks	Fri 7/19/13	Wed 11/27/13	/13	
1 1/	4.1	Proposal for Compling (July 2012)	0 wks	Fri 7/19/13	Fri 7/19/13		
31 4.4 32 4.4	4.1	Proposal for Sampling (July 2013)  EPA Approval of Sampling	0 wks	Mon 7/22/13			
33 4.4		Sample Collection	2 days		Wed 7/31/13		
4 4.4		Analysis and Validation	6.2 wks 33		Thu 9/12/13		
5 4.4	_	Data Summary Report	10.8 wks 34		Wed 11/27/13		
	4.6	Beazer Submit Data Summary and Fingerprinting Report	0 wks 35	Wed 11/27/13			
7 4	4.5	Pilot Home Soil Replacement	10.3 wks	Thu 9/26/13			
8 4.5	5.1	Survey	1.8 wks	Thu 9/26/13	Tue 10/8/13	<u>/13</u>	
	5.2	Design & Interview	3 wks 38	Wed 10/9/13			
0 4.5		Borrow Sampling	2 wks	Thu 10/10/13			
1 4.5		Sample Analysis	2 wks 40	Thu 10/24/13			
2 4.5		Pilot Plan	6 wks		Wed 11/6/13		
3 4.5 4 4.5		Submit Pilot Plan Review	0 wks 42,41 1 wk 43	Wed 11/6/13	Wed 11/6/13 Wed 11/13/13	(13)   <b>*</b>     <b>*</b>	
4 4.5 5 4.5		EPA Approval of Pilot Plan	0 wks 44	Wed 11/13/13			
6 4.5		Permitting	2 wks 45FF	Thu 10/31/13			
7 4.5.		Pilot Implementation	3.3 wks 46,45	Thu 11/14/13			
		Blocks A-I Remediation Design	42.4 wks	Mon 9/16/13			
9 4.6		Remedial Design Details	12.4 wks 35	Thu 11/28/13			
0 4.6		Submit RD Details	0 wks 49	Fri 2/21/14			
1 4.6		Review and Comment	0.8 wks 50	Mon 2/24/14			
2 4.6		Surveying & Interviews	34 wks	Mon 9/16/13			
3 4.6		Parcel Designs & Remediation Agreements	28 wks	Mon 12/2/13			
4 4.6		Final Design and RAWP	19.6 wks	Fri 2/21/14			
4.6.6		Submit Pre-Final Designs & RAWP: Blocks G & H	0 wks	Fri 2/21/14			
6 4.6.6		Final Design and RAWP Approval: Blocks G-H	1 wk 55	Fri 2/21/14			
7 4.6.6 8 4.6.6		Submit Pre-Final Designs & RAWP: Blocks E&F Final Design and RAWP Approval: Blocks E&F	0 wks	Fri 3/7/14			
8 4.6.6 9 4.6.6		Submit Pre-Final Designs & RAWP: Block D	1 day 57 0 wks	Fri 3/7/14 Thu 4/3/14			
9 4.6.6 0 4.6.6		Final Design and RAWP Approval: Block D	2 days 59	Thu 4/3/14 Thu 4/3/14			
1 4.6.6		Submit Pre-Final Designs & RAWP: Block C	0 wks 59FF+4 wks				
2 4.6.6		Final Design and RAWP Approval: Block C	0 wks 61		Wed 4/30/14		
	J. J.	. Mai Boolgii ana 17 (11) Appiotal. Blook O					
4.6.6		Submit Pre-Final Designs & RAWP: Block B	0 wks 61FF+3.1 wk	Thu 5/22/14	Thu 5/22/14	/14	

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D WBS	Fack Nama	Duration Predecessors	Ctort	Einiah	GAINESVILLE REMEDIAL DESIGN	2015	2016	2017	2040	I
MRS	Fask Name	Duration Predecessors	Start	Finish	2013 2014 tr 4   Qtr 1   Qtr 2   Qtr 3   Qtr 4   Qtr 1   Qtr 2   Qtr 3   Qtr 4	2015 Qtr 1   Qtr 2   Qtr 3   Qtr 4   Q	2016 tr 1   Qtr 2   Qtr 3   Qtr 4	2017   Qtr 1   Qtr 2   Qtr 3   Qtr 4	2018 Qtr 1   Qtr 2   Qtr 3   Qtr	4   Qtr 1
6.6.10	Final Design and RAWP Approval: Block B	0.6 wks 63	Thu 5/22/14	Tue 5/27/14						
6.6.11	Submit Pre-Final Designs & RAWP: Block A	0 wks 63FF+3 wks		Thu 6/12/14						
6.6.12	Final Design and RAWP Approval: Block A	0.6 wks 65	Thu 6/12/14	Tue 6/17/14						
7 6.6.13	Submit Pre-Final Designs & RAWP: Block I	0 wks 65FF+3.5 wk		Mon 7/7/14						
8 6.6.14 9 <b>4.7</b>	Final Design and RAWP Approval: Block I  Sampling for Refinement of Remediation Parcels (Feb 2014)	0.2 wks 67 24.8 wks	Tue 7/8/14 Wed 2/19/14	Tue 7/8/14						
4.7	Sampling for Rennement of Renlegiation Farcers (Feb 2014)	24.0 WKS	vveu 2/19/14	Tue 0/12/14						
4.7.1	Beazer & EPA Sampling	0.2 wks	Wed 2/19/14							
1 4.7.2	Analysis and Validation	7.2 wks 70	Thu 2/20/14							
2 4.7.3	Data Summary Report Addendum	16 wks 71	Fri 4/11/14							
3 4.7.4	Beazer Submit Report Addendum	0 wks 72	Thu 7/31/14							
4 4.7.5	Call to discuss Report Addendum	0 wks 73	Tue 8/12/14							
5 <b>4.8</b> 6 4.8.1	Blocks J & K Remediation Design Access Agreements for Design	12.2 wks 2 wks	Mon 6/2/14 Mon 6/2/14	Mon 8/25/14 Fri 6/13/14						
7 4.8.2	Surveying & Interviews	2 wks 5 wks 76	Mon 6/16/14	Fri 7/18/14						
8 4.8.3	Preliminary Design	5 wks 77SS+1 wk	Mon 6/23/14	Fri 7/25/14						
9 4.8.4	Pre-Final Design and Access	7 wks 78SS+1 wk	Mon 6/30/14	Fri 8/15/14						
0 4.8.5	RAWP: Block J	0 wks	Fri 7/25/14	Fri 7/25/14						
1 4.8.6	Final Design & RAWP Approval: Block J	1 wk 80	Fri 7/25/14	Thu 7/31/14						
2 4.8.7	RAWP: Block K	0 days 79	Wed 8/20/14							
3 4.8.8	Final Design and RAWP Approval: Block K	4 days 82	Wed 8/20/14		<b> </b>   <b> </b>   <b> </b>					
4.9	Community Meetings	16.4 wks	Fri 10/25/13							
4.9.1	Community Meeting: Landscaping Workshop - City (Oct 26)	2 days		Mon 10/28/13						
4.9.2 4.9.3	Community Meeting (Jan 18 2014) Community Meeting (Feb 18 2014)	2 days 0 wks	Tue 2/18/14	Mon 1/20/14 Tue 2/18/14						
7 4.9.3 3 4.10	Implementation of Remedial Action	39 wks								
9 4.11	Pre-Final Inspection	0 wks 88	Tue 11/18/14							
4.11	Prepare Implementation Report	36.4 wks 88	Mon 11/17/14	Tue 7/28/15	<u> </u>					
1 4.13	Submit Implementation Report	0 wks 90	Tue 7/28/15		<u> </u>	•				
2 4.14	EPA Approval of Implementation Report	0 wks		Thu 8/27/15		•				
3	·									
	Cutoff Wall and Stormwater Controls: DESIGN TRACK #2		Wed 12/17/14				<del>  </del>			
5 5.1	Pre-Design Work Plan		Wed 12/17/14		<u> </u>					
5.2	Submit Pre-Design Work Plan	0 wks 95	Wed 5/13/15			•				
7 5.3	Review and Comment	10 wks 96		Wed 7/22/15						
8 5.4 9 5.5	Submit Response to Comments and Revised Plan  EPA Approval of Pre-Design Work Plan	0 wks 97FS+5.2 wk 0 wks 98FS+0.2 wk		Thu 8/27/15 Fri 8/28/15		•				
0 <b>5.6</b>	Pre-Design Investigation	32 wks	Mon 8/31/15							
)1 5.6.1	Planning & Preparation	4 wks 99	Mon 8/31/15	Fri 9/25/15		<u> </u>	•			
0.6.1	Field Work	11 wks 101	Mon 9/28/15							
3 5.6.3	Lab Work	20 wks 102FS-3 wks	Mon 11/23/15	Fri 4/8/16						
4 5.7	Preliminary Design	5 wks 103FS-2 wks		Fri 4/29/16						
5 5.8	, , ,	0 wks 104	Fri 4/29/16							
5.9	Review and Comment	4 wks 105	Mon 5/2/16							
	Pre-Final Design	5 wks 106	Mon 5/30/16							
8 5.11 9 5.12	Review and Comment Final Design	5 wks 107 5 wks 108	Mon 7/4/16 Mon 8/8/16							
5.12	Review	3 wks 108	Mon 9/12/16							
1 5.14	EPA Approval of Final Design	0 wks 110	Fri 9/30/16							
2 5.15		8 wks 111		Fri 11/25/16						
3 5.16	Submit RAWP	0 wks 112		Fri 11/25/16						
14										
	n-Situ Geochemical Stabilization (ISGS): DESIGN TRACK #3	202.7 wks		Tue 12/27/16	▼			•		
16 <b>6.1</b>		189.6 wks		Mon 9/26/16						
7 6.1.1	EPA Approval of ISGS Demonstration Work Plan (2012)	0 wks	Thu 2/7/13							
6.1.2	Preliminary Design (included in Demonstration Work Plan)	0 wks	Thu 2/7/13							
9 6.1.3	Characterization and DNAPL Recovery (began 2012) Characterization Report and Pilot Test Plan	32 wks		Wed 9/18/13						
0 6.1.4 1 6.1.5	Submit Characterization Report and Pilot Test Plan	11.8 wks 119 0 wks 120	Tue 12/10/13	Tue 12/10/13						
2 6.1.6	Review and Approval of Pilot Test Plan		Wed 12/11/13							
3 6.1.7	Technical Working Group Meeting	0 wks	Wed 12/11/13 Wed 12/18/13							
4 6.1.8	Pilot Injection Testing	15 wks 122		Fri 6/27/14						
5 6.1.8.1	Pre-Pilot Testing & Chemical Delivery	1 wk	Mon 3/17/14							
26 5.1.8.2	Pilot Injections	3 wks 125	Mon 3/24/14							
27 5.1.8.3	Borings in Injection Area	1 wk 126FS+10 wł								

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ID WBS Task Name	Duration	Predecessors Start	Finish
192			
193 9 Institutional Control	200.8 wks		
194 9.1 Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5 Tue 7/9/13	
195 9.2 Submit ICIAP	0 wks	194 Fri 8/23/13	Fri 8/23/1
196 9.3 Review	12.5 wks	195 Mon 8/26/13	Wed 11/20/1
197 9.4 Beazer Respond to Comments	60 wks	196 Mon 4/6/15	Fri 5/27/1
198 9.5 Beazer Submit Responses & ICIAP Version 2	0 wks	197 Fri 5/27/16	Fri 5/27/1
199 9.6 Review	3 wks	198 Mon 5/30/16	
200 9.7 EPA and FDEP Approval of ICIAP	0 wks	199 Fri 6/17/16	Fri 6/17/1
201 9.8 Implement Beazer-Property Restrictive Covenant	47 wks	Mon 6/20/16	Fri 5/12/1
202 9.8.1 Draft Proprietary Controls Package	13 wks	200 Mon 6/20/16	Fri 9/16/1
203 9.8.2 Submit Draft Proprietary Controls Package	0 wks	202 Fri 9/16/16	Fri 9/16/1
204 9.8.3 Review and Updating	8 wks	203 Mon 9/19/16	Fri 11/11/1
205 9.8.4 Update Title Search and Prepare Public Notice	8 wks	204 Mon 11/14/16	Fri 1/6/1
206 9.8.5 Beazer Publish Public Notice	0 wks	205 Fri 1/6/17	Fri 1/6/1
207 9.8.6 Public Comment Period	4.4 wks	206 Mon 1/9/17	Tue 2/7/1
208 9.8.7 Address Comments and Exectute Restrictive Covenant	5 wks	207 Wed 2/8/17	Tue 3/14/1
209 9.8.8 Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	208 Tue 3/14/17	Tue 3/14/1
210 9.8.9 Prepare Final Proprietary Controls Package	8.6 wks	209 Wed 3/15/17	Fri 5/12/1
211 9.8.10 Submit Final Proprietary Controls Package	0 wks	210 Fri 5/12/17	Fri 5/12/1

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Milestone •