



September 9, 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: **August 2016 Monthly Progress Report**

Dear Mr. Kestle :

On behalf of Beazer East, Inc. (Beazer), attached is the August 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,

A handwritten signature in blue ink, appearing to read 'Gregory W. Council'.

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, Community Technical Advisor
Linda Paul, Koppers, Inc.
Mitchell Brouman, TRMI
Mike Slenska, TRMI
Donna Kopach, TRMI
Jim Erickson, Tetra Tech
Wayne Reiber, Cabot Corporation
Steve Clark, FTS
John Helton, FTS
Bryan Cotter, Water and Air Research, Community Technical Advisor

**AUGUST 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 2015 following ISGS injections. Recovery data were included in the report entitled *Phase II Performance Monitoring of In-Situ Geochemical Stabilization Remediation for the Former Process Area, Cabot/Koppers Superfund Site, Alachua County, Florida*, dated August 1, 2016.
- A total of 3,957,405 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 730 hours). The average recovery rate for the month was approximately 90.4 gallons per minute (gpm). The recovery for each component is listed below.
 - Surficial Aquifer
 - Perimeter Extraction Wells: 571,282 gallons
 - Former North Lagoon Drain: 459,170 gallons
 - Former Drip Track Drain: 460,560 gallons
 - Former Process Area Drain: 425,360 gallons
 - Former South Lagoon Drain: 438,630 gallons
 - Upper Floridan Extraction Wells
 - FW-6: 12,372 gallons
 - FW-21B: 161,275 gallons
 - FW-31BE: 953,260 gallons
 - FW-32BE: 475,496 gallons

Approximately 395.0 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 2,464,000 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 7 hours to pump and clean clarifiers and to treat backwash water, along with an unknown amount of time between Aug 6-7, 2016 when the circuit breaker tripped.

3. Plans, Reports, Deliverables and Procedures Completed:

- On August 1, 2016, Beazer submitted the report entitled *Phase II Performance Monitoring of In-Situ Geochemical Stabilization Remediation for the Former Process Area, Cabot/Koppers Superfund Site, Alachua County, Florida*
- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) August 16, 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). This included replacing high level alarm in feed tank, replacing pH cartridge, cleaning sump pump and repairing plant air lines. New ferric and process pump ordered.
- System down for 14 hrs due to trip of electrical breaker on Aug 19, 2016.
- Irrigation Breakthrough sampling on August 31, 2016.
- Repaired FW-6 compressor.
- Shocked EW-11.
- Shipped 3 drums PPE, 16 drums treatment sludge, 3 drums DNAPL and 44 drums of spent carbon on August 1, 2016.
- Third quarter sampling event: August 15-26, 2016.
- 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.
- Fourth quarter sampling event Dec 5-9, 2016.

5. Schedule Status:

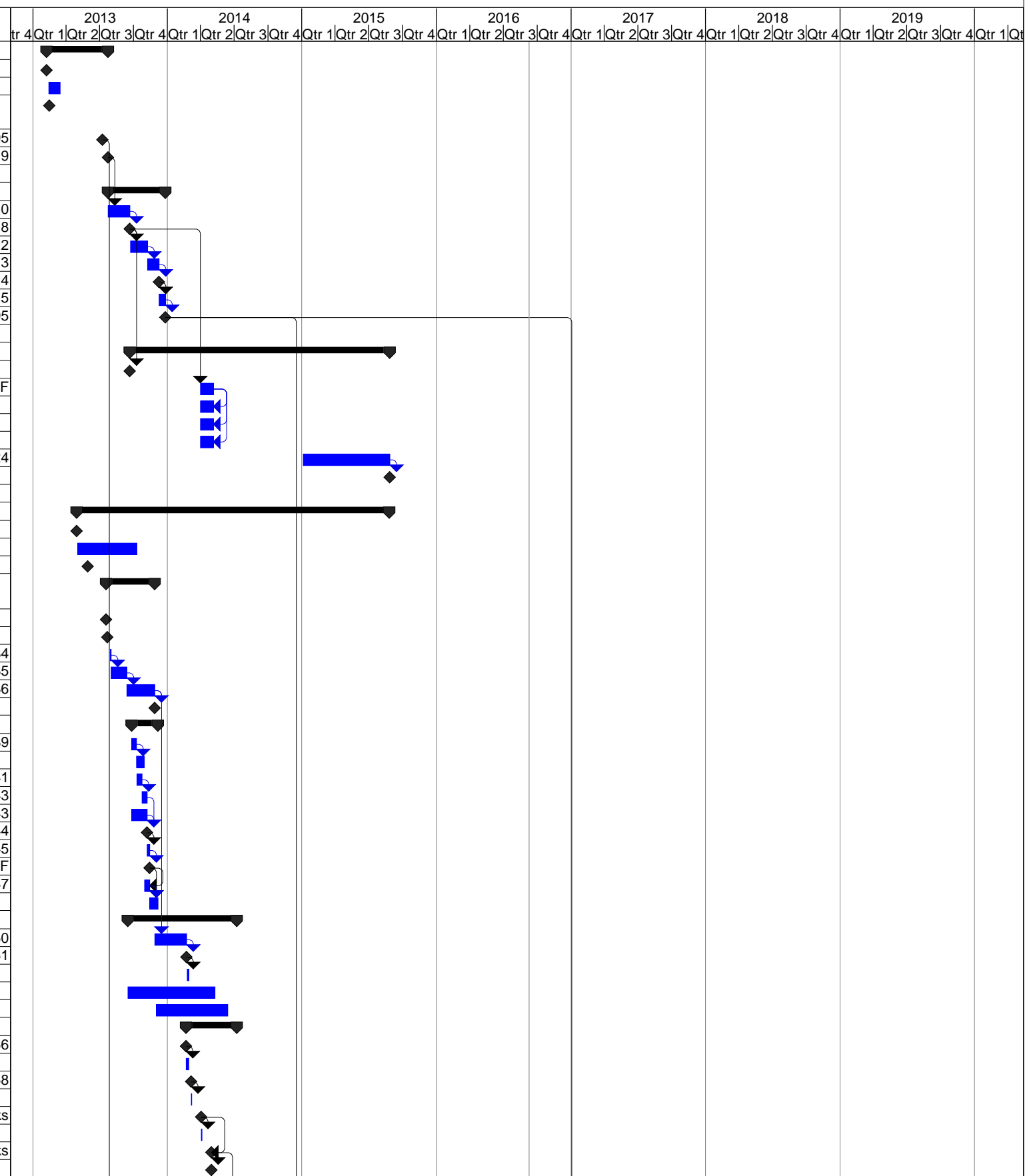
- Minor modifications were made to the project schedule.

6. Community Involvement:

- Future community involvement activities will be coordinated with EPA.

GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	Successors	2013	2014	2015	2016	2017	2018	2019																	
								Qtr 4	Qtr 1	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	Qtr 3	Qtr 4							
1		1 Consent Decree for RD/RA	23.8 wks		Thu 2/7/13	Wed 7/24/13																									
2	1.1	US DOJ Lodges Donsent Decree with Court	0 days		Thu 2/7/13	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																									
5	1.4	Court Enters Consent Decree Final	0 days		Tue 7/9/13	Tue 7/9/13	195																								
6	1.5	EPA Issues Authorization to Proceed with Remedial Design	0 days		Wed 7/24/13	Wed 7/24/13	9																								
7																															
8		2 Remedial Design Work Plan (RDWP)	22.3 wks		Wed 7/24/13	Thu 12/26/13																									
9	2.1	Prepare RDWP	43 days	6	Wed 7/24/13	Fri 9/20/13	10																								
10	2.2	Beazer Submit RDWP	0 wks	9	Fri 9/20/13	Fri 9/20/13	11,19,18																								
11	2.3	EPA Review and Comment RDWP	6.8 wks	10	Mon 9/23/13	Thu 11/7/13	12																								
12	2.4	Beazer Respond to Comments	4.3 wks	11	Fri 11/8/13	Mon 12/9/13	13																								
13	2.5	Beazer Submit Responses and RDWP Version 2	0 wks	12	Mon 12/9/13	Mon 12/9/13	14																								
14	2.6	EPA Review	2.6 wks	13	Mon 12/9/13	Thu 12/26/13	15																								
15	2.7	EPA Approval RDWP	0 wks	14	Thu 12/26/13	Thu 12/26/13	158,95																								
16																															
17		3 Supporting Plans for RD/RA	100.8 wks		Fri 9/20/13	Thu 8/27/15																									
18	3.5	Beazer Submit Health & Safety Plan	0 wks	10	Fri 9/20/13	Fri 9/20/13																									
19	3.2	Materials Management Plan	5 wks	10	Tue 4/1/14	Mon 5/5/14	20FF,21FF,22FF																								
20	3.6	Stormwater Management Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14																									
21	3.7	Noise and Dust Control Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14																									
22	3.5	Equipment Decontamination Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14																									
23	3.6	Beazer update QAPP	33.8 wks		Mon 1/5/15	Thu 8/27/15	24																								
24	3.7	Beazer Submit Revised QAPP	0 wks	23	Thu 8/27/15	Thu 8/27/15																									
25																															
26		4 Off-Property Soil Replacement (OU-5): DESIGN TRACK #1	121.4 wks		Tue 4/30/13	Thu 8/27/15																									
27	4.1	Initial Identification of Remediation & Evaluation Parcels	0 wks		Tue 4/30/13	Tue 4/30/13																									
28	4.2	Obtain Access Agreements for Surveys & Sampling	23 wks		Thu 5/2/13	Wed 10/9/13																									
29	4.3	Community Information Session	0 wks		Thu 5/30/13	Thu 5/30/13																									
30		4.4 Sampling for Refinement of Remediation Parcels (July 2013)	18.8 wks		Fri 7/19/13	Wed 11/27/13																									
31	4.4.1	Proposal for Sampling (July 2013)	0 wks		Fri 7/19/13	Fri 7/19/13																									
32	4.4.2	EPA Approval of Sampling	0 wks		Mon 7/22/13	Mon 7/22/13																									
33	4.4.3	Sample Collection	2 days		Tue 7/30/13	Wed 7/31/13	34																								
34	4.4.4	Analysis and Validation	6.2 wks	33	Thu 8/1/13	Thu 9/12/13	35																								
35	4.4.5	Data Summary Report	10.8 wks	34	Fri 9/13/13	Wed 11/27/13	49,36																								
36	4.4.6	Beazer Submit Data Summary and Fingerprinting Report	0 wks	35	Wed 11/27/13	Wed 11/27/13																									
37		4.5 Pilot Home Soil Replacement	10.3 wks		Thu 9/26/13	Fri 12/6/13																									
38	4.5.1	Survey	1.8 wks		Thu 9/26/13	Tue 10/8/13	39																								
39	4.5.2	Design & Interview	3 wks	38	Wed 10/9/13	Tue 10/29/13																									
40	4.5.3	Borrow Sampling	2 wks		Thu 10/10/13	Wed 10/23/13	41																								
41	4.5.4	Sample Analysis	2 wks	40	Thu 10/24/13	Wed 11/6/13	43																								
42	4.5.5	Pilot Plan	6 wks		Thu 9/26/13	Wed 11/6/13	43																								
43	4.5.6	Submit Pilot Plan	0 wks	42,41	Wed 11/6/13	Wed 11/6/13	44																								
44	4.5.7	Review	1 wk	43	Thu 11/7/13	Wed 11/13/13	45																								
45	4.5.8	EPA Approval of Pilot Plan	0 wks	44	Wed 11/13/13	Wed 11/13/13	47,46FF																								
46	4.5.9	Permitting	2 wks	45FF	Thu 10/31/13	Wed 11/13/13	47																								
47	4.5.10	Pilot Implementation	3.3 wks	46,45	Thu 11/14/13	Fri 12/6/13																									
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	Fri 2/21/14	50																								
50	4.6.2	Submit RD Details	0 wks	49	Fri 2/21/14	Fri 2/21/14	51																								
51	4.6.3	Review and Comment	0.8 wks	50	Mon 2/24/14	Thu 2/27/14																									
52	4.6.4	Surveying & Interviews	34 wks		Mon 9/16/13	Fri 5/9/14																									
53	4.6.5	Parcel Designs & Remediation Agreements	28 wks		Mon 12/2/13	Fri 6/13/14																									
54		4.6.6 Final Design and RAWP	19.6 wks		Fri 2/21/14	Tue 7/8/14																									
55	4.6.6.1	Submit Pre-Final Designs & RAWP: Blocks G & H	0 wks		Fri 2/21/14	Fri 2/21/14	56																								
56	4.6.6.2	Final Design and RAWP Approval: Blocks G-H	1 wk	55	Fri 2/21/14	Thu 2/27/14																									
57	4.6.6.3	Submit Pre-Final Designs & RAWP: Blocks E&F	0 wks		Fri 3/7/14	Fri 3/7/14	58																								
58	4.6.6.4	Final Design and RAWP Approval: Blocks E&F	1 day	57	Fri 3/7/14	Fri 3/7/14																									
59	4.6.6.5	Submit Pre-Final Designs & RAWP: Block D	0 wks		Thu 4/3/14	Thu 4/3/14	60,61FF+4 wks																								
60	4.6.6.6	Final Design and RAWP Approval: Block D	2 days	59	Thu 4/3/14	Fri 4/4/14																									
61	4.6.6.7	Submit Pre-Final Designs & RAWP: Block C	0 wks	59FF+4 wks	Wed 4/30/14	Wed 4/30/14	62,63FF+3.1 wks																								
62	4.6.6.8	Final Design and RAWP Approval: Block C	0 wks	61	Wed 4/30/14	Wed 4/30/14																									



GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	Successors	2013		2014				2015				2016				2017				2018				2019			
								Qtr 4	Qtr 1	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	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1
189	8.12	Review	4 wks	188	Thu 5/10/18	Wed 6/6/18	190																										
190	8.13	EPA Approval of Final Design	0 wks	189	Wed 6/6/18	Wed 6/6/18	191																										
191	8.14	Prepare RAWP	8 wks	190	Thu 6/7/18	Wed 8/1/18	192																										
192	8.15	Submit RAWP	0 wks	191	Wed 8/1/18	Wed 8/1/18																											
193																																	
194	9	Institutional Control	221.8 wks		Tue 7/9/13	Fri 10/6/17																											
195	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13	196																										
196	9.2	Submit ICIAP	0 wks	195	Fri 8/23/13	Fri 8/23/13	197																										
197	9.3	Review	12.5 wks	196	Mon 8/26/13	Wed 11/20/13	198																										
198	9.4	Beazer Respond to Comments	81 wks	197	Mon 4/6/15	Fri 10/21/16	199																										
199	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	198	Fri 10/21/16	Fri 10/21/16	200																										
200	9.6	Review	3 wks	199	Mon 10/24/16	Fri 11/11/16	201																										
201	9.7	EPA and FDEP Approval of ICIAP	0 wks	200	Fri 11/11/16	Fri 11/11/16	203																										
202	9.8	Implement Beazer-Property Restrictive Covenant	47 wks		Mon 11/14/16	Fri 10/6/17																											
203	9.8.1	Draft Proprietary Controls Package	13 wks	201	Mon 11/14/16	Fri 2/10/17	204																										
204	9.8.2	Submit Draft Proprietary Controls Package	0 wks	203	Fri 2/10/17	Fri 2/10/17	205																										
205	9.8.3	Review and Updating	8 wks	204	Mon 2/13/17	Fri 4/7/17	206																										
206	9.8.4	Update Title Search and Prepare Public Notice	8 wks	205	Mon 4/10/17	Fri 6/2/17	207																										
207	9.8.5	Beazer Publish Public Notice	0 wks	206	Fri 6/2/17	Fri 6/2/17	208																										
208	9.8.6	Public Comment Period	4.4 wks	207	Mon 6/5/17	Tue 7/4/17	209																										
209	9.8.7	Address Comments and Execute Restrictive Covenant	5 wks	208	Wed 7/5/17	Tue 8/8/17	210																										
210	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	209	Tue 8/8/17	Tue 8/8/17	211																										
211	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	210	Wed 8/9/17	Fri 10/6/17	212																										
212	9.8.10	Submit Final Proprietary Controls Package	0 wks	211	Fri 10/6/17	Fri 10/6/17																											

Red text used for current tasks

