



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

61 Forsyth Street

Atlanta, Georgia 30303-3104

August 24, 2017
Mr. Wayne Reiber, P.E.
Manager
Environmental Assessment and Remediation
Corporate Safety, Health and Environmental Affairs
Cabot Corporation
Two Seaport Lane, Suite 1300
Boston, MA 02210

Re: EPA Comments on Cabot Carbon Remedial Design Workplan

Dear Mr. Reiber:

Thank you for the August 10, 2017, Cabot Carbon Remedial Design Workplan. EPA's comments on the Workplan are as follows:

2.2.1 Summary of Historical Investigations

At the bottom of page 6, the following information is provided:

“Based on the initial investigations, a ROD was issued in 1990. Cabot executed the ROD required actions, including the installation of a surficial aquifer groundwater interceptor trench in 1994 on the Cabot Carbon portion of the Site, and performed supplemental investigations. Through discussions with US EPA and stakeholders, Cabot agreed to perform additional supplemental investigations. A series of HG investigations on the Cabot Carbon Site were performed between 2009 and 2016 culminating in the 2017 SRI/FFS that recommended a combined remedy that includes containment, groundwater extraction and treatment, and hydraulic controls for the HG formation. US EPA accepted the SRI/FFS and conditionally approved the Hawthorn Remedy in a letter to Cabot dated 10 April 2017.”

We would simply point out that the requirement for the FFS was from the 2011 Record of Decision (page 125 at 11.2.1.11 Contingent Treatment Actions in the Hawthorn Group) that required Cabot Carbon execute a remedy in the Hawthorn Group.

Part III: Surficial Aquifer Remedy Optimization Evaluation

We would expect that an evaluation of targeted source removal would also be considered as part of the optimization remedy. Our aim is to reduce the needed time to meet surficial aquifer cleanup goals, and removing source mass from the system would help achieve this end.

The RD Workplan submittal continues the practice of solely referring to pine tar impacts as the point of interest for remediation. As was expressed in our April 10, 2017, FFS approval letter, the Agency continues to believe that there are other former Cabot Carbon Site contaminants associated with fuel-burning operations that will require remediation. We won't belabor those points here, but to say that our future evaluations of data collected and required footprints for remediation will rely in part on those other compounds from the former Cabot operations beyond pine tar constituents.

4. ENGINEERING DESIGN PROCESS

4.1 Overview

We concur with the proposed process, but do want to ensure that the technical working group (i.e. the Local Intergovernmental Team) be a part of the proposed meeting, and fully be involved with the technical evaluations of the PDI data. We would respectfully request that this meeting occur in Gainesville to facilitate that process. As always, we are available for scheduled conference calls with Cabot and/or Cabot consultants on an ongoing basis if there is a desire to have multiple discussions in advance of or after the Gainesville meeting. We have appreciated Cabot's willingness to conduct similar meetings in the past with the LIT.

4.2.7 Cost Estimate and Constructability Review

The estimated construction cost must be included in the Final Design Report. It will likely be a consideration in considering the needed financial assurance for the project as required by the Cabot's consent decree.

6. REMEDIAL DESIGN CRITICAL PATH SCHEDULE

We respectfully request that the schedule be expanded to include Remedial Action initiation and full execution. We understand that all dates are subject to change based on conditions encountered in the field, etc. However, we would like to have a targeted end date for RA completion of the barrier wall and hydraulic containment components. This addition would also make the schedule consistent with the schedule devised for the remedial actions taking place at the nearby Koppers Site. The added benefit would be that the community could know when we expect to have construction completed of all remedial actions there.

Thank you,

Scott Miller
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