

From: Hutton, Richard H
To: jrherbert1863@yahoo.com; Richard E. Jackson; Stanley Feenstra
Cc: [Anthony Dennis \(anthony_dennis@DOH.state.fl.us\)](mailto:Anthony Dennis (anthony_dennis@DOH.state.fl.us)); Cunningham, Anthony L; Dean.Williamson@CH2M.com; John Mousa; Murry, Fredrick J; Pearson, Stewart E; Robin Hallbourg; [stewart.Pearson \(sep4310@gmail.com\)](mailto:stewart.Pearson (sep4310@gmail.com)); Sweigard, Kimberly A
Subject: FW: Koppers Proposed Plan
Date: Monday, October 18, 2010 8:44:47 AM

John - Thank you for sending this

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-----Original Message-----

From: Miller.Scott@epamail.epa.gov [<mailto:Miller.Scott@epamail.epa.gov>]
Sent: Friday, October 15, 2010 2:43 PM
To: John Herbert
Cc: Hutton, Richard H
Subject: Re: Koppers Proposed Plan

John,
Thank you.
Scott Miller
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From: John Herbert <jrherbert1863@yahoo.com>
To: Scott Miller/R4/USEPA/US@EPA
Cc: Richard H Hutton <HUTTONRH@gru.com>
Date: 10/15/2010 12:08 PM
Subject: Koppers Proposed Plan

Scott,
My reading of the Proposed Plan indicates that the matter of arsenic contamination in the Surficial Aquifer is given very little attention in that document. The plan identifies a number of COC in groundwater, including arsenic, and goes on to focus on naphthalene as the primary indicator of site related contaminants. The Proposed Plan goes on to

state that "Concentrations of some other COCs (PCP, arsenic, benzene, carbazole, dibenzofuran) also exceed their default GCTLs and/or federal maximum contaminant levels (MCLs) in certain wells".

That level of detail may be appropriate in the Proposed Plan; however, I want to make sure that the ROD requires that the dissolved arsenic plumes in the Surficial Aquifer are adequately characterized and remediated. I believe that the arsenic plumes are not adequately characterized at the north side of the Former South Lagoon - and downgradient of that apparent source - and at the eastern property boundary. Specifically:

The apparent source of dissolved arsenic contamination at the north side of the Former South Lagoon is an issue because the slurry wall, as presented in the FS is located very near the mapped boundary of that source area and the contaminated well. I understand that the slurry wall location as presented in the FS is simply intended to convey the concept of a slurry wall encompassing all four source areas, but I want to make the point that dissolved arsenic plumes should be considered during slurry wall design. I assume that the intent is to contain the dissolved arsenic plumes inside the slurry wall; so complete knowledge of the extent of those plumes will be required.

The eastern property line is important because, by GeoTrans' admission, the Surficial Aquifer groundwater extraction system is less than 100% efficient (GRU believes it is much less than 100% efficient) and allows contaminated groundwater to pass between the extraction wells. That has allowed groundwater contaminated by arsenic, among other COCs, to flow onto the railroad right of way and presumably on to the Cabot Carbon Site. The proposed remedial alternative will not address offsite contamination in the Surficial Aquifer.

Also, the continuing presence of arsenic in Floridan well FW-3 at concentrations more than twice the MCL - on the western property boundary - has not been explained after seven years of monitoring.

The issue of dissolved arsenic contamination in the Surficial Aquifer - onsite and offsite - and in well FW-3 must be addressed in the ROD.

Thanks Scott.