

July 20, 2007

Mr. Scott Miller
Remedial Project Manager
United States Environmental Protection Agency
Region IV, Superfund Remedial Branch
61 Forsyth Street
Atlanta, GA 30303-3104

RE: Response to EPA Comment Memo dated June 29, 2007 on the review of the Supplemental Hawthorn Group Investigation and Monitoring Well Installation Workplan, Revision #1, Koppers Inc. Site, Gainesville, Florida.

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), this letter is in response to EPA's comments on the *Supplemental Hawthorn Group Investigation and Monitoring Well Installation Workplan, Revision #1, Koppers Inc. Site, Gainesville, Florida* dated June 12, 2007. Beazer's detailed response to the June 29, 2007 EPA memo is provided in Attachment A of this letter. Revision #2 of the *Supplemental Hawthorn Group Investigation and Monitoring Well Installation Workplan* is provided under separate cover.

Beazer is prepared to proceed with the work described in the workplan, once approval is received from the EPA. If you should have any questions or require additional information, please contact me at (303) 665-4390.

Sincerely,



James R. Erickson
Project Manager

Attachments

cc: W. O'Steen, EPA
K. Helton, FDEP
J. Mousa, ACEPD
B. Goodman, GRU
M. Brouman, BEI
M. Slenska, BEI
J. Blundon, BEI
J. Fankulewski, KI

Attachment A
**Response to EPA Comment Memo dated June 29, 2007 on the review of
the Supplemental Hawthorn Group Investigation and Monitoring Well
Installation Workplan, Revision #1, Koppers Inc. Site, Gainesville,
Florida.**

Comment 1: *EPA requests that to assure that no contamination in the upper Hawthorn has potentially migrated to the west of the identified area of significant upper Hawthorn contamination, that a field screening technique or techniques should be proposed and implemented for evaluating the potential for significant organic contamination in the entire drilled sections at the four proposed lower Hawthorn well borings to be completed at and west of the western Koppers property boundary. Section 3.1 states that core will be monitored for observable creosote impacts. However, the plan also needs to specify that other potential organic contaminants will be monitored via field observations (I recommend PID analysis of bagged core samples with readings taken through the intact sample bags immediately after core retrieval in order to assure minimal volatilization of the core). The instrument used should be capable of detecting naphthalene and benzene. A suggested procedure to follow is the EPA Environmental Response Team standard operating procedure #2114 for PID (reference available online at the address <http://www.ert.org/mainContent.asp?section=Products&subsection=List>). Samples should be tested at multiple locations in the core retrieval bag to provide comprehensive characterization of the core samples.*

Such information should provide assurance that significant organic contamination is not present at depths shallower than the completion intervals for the four lower Hawthorn group wells near the western Koppers boundary. This comment has general applicability to all of the new Hawthorn well locations. It may be useful for correlating specific field PID readings from core samples to the associated contaminant concentrations that will be observed in ground-water samples from the new Hawthorn monitoring wells. This information would provide a better basis for deciding if PID readings from upper Hawthorn core samples taken from the western lower Hawthorn well soil borings warrant any upper Hawthorn monitoring in those western well locations.

Response: We concur with this comment. As part of our standard operating procedures for the installation of monitoring wells at this Site, we will perform PID measurements on all cores and document the measurements in our field log book. In addition, we will perform these measurements as detailed in the SOP referenced in this comment. Text in Section 3.1 has been modified to address this comment.

Comment 2: *Regarding the Section 2.2.1 discussion of the location of well pair HG-26S and HG-26D, I believe these wells will be located upgradient of the former Cabot Carbon process area, rather than downgradient of that area. Perhaps the intention of the writer was to either indicate the wells would be downgradient of the former Koppers process area, or upgradient of the former Cabot Carbon process area.*

Response: The text in Section 2.2.1 has been amended for clarification.

Comment 3: *The statement about potential low level impacts Site impacts at HG-4S (bottom of*

page 4; top of page 5) does not correctly characterize EPA's statement about contamination in samples from that monitoring well. EPA does not consider the HG-4S contamination "potential", nor is the HG-4S contamination considered to be "low-level." The text needs to be changed to just state that the letter indicates impacts have been observed in the HG-4S samples.

Response: The words "potential low-level" have been deleted from the sentence at the bottom of page 4.

Comment 4: *The absence of impacts at well ITF-3 makes moot the statements in the last paragraph of Section 2.2.1. Regardless of that point, if there were impacts in samples from this well, it is not a certainty that such impacts would be the responsibility of Cabot Carbon, as current data does not clearly indicate that any ITF-3 impacts would be attributable to only Cabot Carbon or potentially to either Cabot or Koppers.*

Response: The second sentence has been deleted in the last paragraph of Section 2.2.1

Comment 5: *In the Section 2.2.2 discussion of proposed additional Hawthorn well HG-22D, the text would be improved if a brief statement was added about what the Geiersbach well is (an abandoned upper Floridan aquifer private water-supply well near the Koppers western property boundary).*

Response: As requested, a brief statement has been added about the Geiersbach well in Section 2.2.2.

Comment 6: *Section 3.1, "Western Off-Site and On-Site Wells", page 8, proposes the wells be drilled without an isolation casing separating the surficial aquifer from the upper Hawthorn. This proposal is acceptable, unless field monitoring data from boreholes drilled for these wells indicates there is some potentially significant contamination residing in the surficial aquifer at such locations. If there are indications of NAPL or otherwise highly contaminated soils at these locations, appropriate steps should be taken to assure that such contamination is not transferred to the Hawthorn, to the extent possible.*

Response: We concur with this comment.

Comment 7: *Concerning Section 3.5 on page 10, it would be useful to sample some existing Hawthorn monitoring wells, concurrently with sampling the proposed new Hawthorn wells. It has been several years since the existing Hawthorn wells have been sampled, and in some of those wells, prior concentrations of some contaminants of potential concern were showing sizeable fluctuations and potential trends that need further evaluation (e.g. HG-6D) It would be most useful to sample existing wells where there have been sizeable fluctuations in water quality, and wells where prior results indicated contamination of concern and that are either more or less upgradient from the new proposed Hawthorn wells or that are on the Koppers property boundary. Suggested existing wells that should be sampled concurrently with the newly installed Hawthorn wells include HG-6S/6D, HG-4S/4I/4D, HG-2D, and HG-5D. This recommendation assumes that other Hawthorn wells close to the identified principal contaminant source areas still monitor highly contaminated ground water. Resampling of such wells would therefore only confirm that highly contaminated ground water characterizes the upper and lower Hawthorn in the core of all such principal contaminant source areas. If this conclusion is disputed, then any such wells can also be resampled to confirm current conditions.*

Response: We concur with this statement and will plan to sample monitoring wells HG-6S/6D, HG-4S/4D, HG-2D and HG-5D. Text in Section 3.5 has been modified to address this comment.