UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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Wayne Reiber
Manager, Environmental Assessment & Remediation
Cabot Corporation
Corporate SH&E
Two Seaport Lane, Suite 1300
Boston, MA 02210-2019

Subject: Review of Remedy Status and Expanded Remedy Performance Monitoring Report, Eastern Portion of the Cabot Carbon / Koppers Superfund Site, Gainesville, Florida

Dear Mr. Reiber:

Thank you for your recent submittal of the "Remedy Status and Expanded Remedy Performance Monitoring Report for the Eastern Portion of the Cabot Carbon/Koppers Superfund Site" (Operable Unit 1), Gainesville, Florida. This report was prepared by Gradient Corporation for Cabot Corporation and is dated October 5,2005. The United States Environmental Protection Agency (EPA) has reviewed this report and is providing its comments below.

Overview

The report makes a fairly complete case that contamination originating at the Cabot Carbon part of the Site is relatively innocuous and is being sufficiently managed by the ongoing remedial action. There is some concern about contamination migrating through the surficial aquifer and Hawthorn Group permeable zones from the Koppers portion of the NPL Site beneath the former Cabot Carbon Site (and north of that area). A report titled "Cabot Carbon/Koppers Superfund Site Technical Memorandum Number 2, Evaluation of the Capture Effectiveness of the Ground Water Extraction System at the Koppers, Inc. Site, Gainesville, Florida. This report indicates that for some areas of surficial aquifer contamination on the Koppers part of the Site, contamination likely bypasses a series of shallow extraction wells on the Koppers property and migrates beneath the former Cabot Carbon Site and areas to the north of Cabot. At some point this contamination apparently enters the Hawthorn Group and eventually, the Ocala Limestone. Indications from this report are that these particles reach the Hawthorn Group before arriving in the vicinity of the trench to the east and northeast of the former Cabot Carbon Site.

The migration of Koppers contamination beneath the Cabot Carbon portion of the NPL Site is not a specific concern with regard to the functioning of the interceptor trench east and northeast of the former Cabot Carbon Site. However, the modeling analysis performed for the

Koppers surficial aquifer brings up at least two important questions that are not specifically addressed in the remedy status report prepared regarding the Cabot Carbon part of the NPL Site:

(1) What is the nature and extent of any dissolved phase ground-water contamination originating at the Cabot Carbon portion of the NPL Site that migrates across the interface between the surficial and upper Hawthorn before reaching the trench interception zone in the surficial aquifer?

(2) Is there any potential for contamination originating at the Cabot Carbon portion of the Site to reach the base of the surficial aquifer and then migrate through the lowermost surficial aquifer, bypassing the trench for some discharge point further downgradient?

The above two questions must be answered in the Five-Year Review of the remedy for the Site. Additional hydraulic head monitoring around the interceptor trench is probably needed to answer the second question, to sufficiently establish both horizontal and vertical hydraulic gradients from top to bottom across the surficial aquifer. Some additional monitoring wells completed in the uppermost Hawthorn Group permeable zone at or downgradient of the former Cabot Carbon Site may also be needed, if there is not definitive evidence that movement of Cabot-derived contaminants into the Hawthorn Group has been inconsequential.

Specific Comments on the Report

(1) Figure 2-3 is a map of the potentiometric surface of the surficial aquifer (derived from a Weston report of 2004; report not fully referenced). While this map is undoubtedly a reasonable depiction of the hydraulic head in at least a part of the surficial aquifer, it is inadequately documented. Specifically, no actual water level data (locations, measured water levels and date(s) of measurement) are included in the report. The same comment technically applies to maps in the report showing potentiometric contours in other monitored zones. However, because the surficial aquifer is the focus of remedial action addressing the Cabot Carbon portion of the site, the omission of data supporting Figure 2-3 is of particular concern. Potentiometric surface maps must be accompanied by all relevant data used to prepare the maps.

(2) Figure 4-1 indicates that ITW-19 is a part of the expanded monitoring program. This point is contradicted by Table 4-1 and Table 4-2.

I appreciate your cooperation on the Cabot/Koppers project. Please contact me at 404-562-8776 to discuss EPA's comments and Cabot's responses to these comments.

Sincerely,

Amy L. McLaughlin

Amy L. McLaughlin
Remedial Project Manager