

ATTACHMENT 4

PHOTOGRAPHS DOCUMENTING SITE CONDITIONS



PHOTOGRAPH 1. KOPPERS, NORTH LAGOON, FEB 1 2006



PHOTOGRAPH 2. TYPICAL MONITORING WELL, EASTERN BOUNDARY, KOPPERS 1 FEB 06



**PHOTOGRAPH 3. INTERIOR OF PUMP HOUSE, EXTRACTION WELL,
KOPPERS, 1 FEB 06**



**PHOTOGRAPH 4. TYPICAL EXTRACTION WELL AND PUMP HOUSE,
KOPPERS, FEB 1 06**



**PHOTOGRAPH 5. CLOSE-UP TYPICAL MONITORING WELL,
KOPPERS, 1 FEB 06**



PHOTOGRAPH 6. WATER TREATMENT PLANT, KOPPERS, 1 FEB 06



**PHOTOGRAPH 7. WATER TREATMENT PLANT, CLOSE-UP,
KOPPERS 1 FEB 06**



PHOTOGRAPH 8. WATER TREATMENT PLANT, INTERIOR VIEW, KOPPERS, 1 FEB 06



PHOTOGRAPH 9. DRIP TRACK AREA, KOPPERS, 1 FEB 06



PHOTOGRAPH 10. CLOSE-UP, DRIP TRACK AREA, WITH NEW FLORIDAN WELL, KOPPERS, 1 FEB 06



PHOTOGRAPH 11. FORMER COOLING POND AREA, KOPPERS, 1 FEB 06



PHOTOGRAPH 12. INTERMEDIATE AQUIFER MONITORING WELL, WITH DNAPL, KOPPERS, 1 FEB 06



PHOTOGRAPH 13. NEWLY INSTALLED FLORIDAN WELL, KOPPERS, 1 FEB 06



**PHOTOGRAPH 14. AREA OF FORMER CABOT LAGOONS,
2 FEB 06**



**PHOTOGRAPH 15. AREA OF FORMER CABOT LAGOONS,
2 FEB 06**



**PHOTOGRAPH 16. MONITORING WELLS EAST OF FORMER
CABOT LAGOONS, 2 FEB 06**



**PHOTOGRAPH 17. SUMP, CABOT TRENCH,
2 FEB 06**



PHOTOGRAPH 18. CABOT LIFT STATION, 2 FEB 06



**PHOTOGRAPH 19. INSIDE CABOT LIFT STATION, CABOT
2 FEB 06**



**PHOTOGRAPH 20. DITCH NE OF KOPPERS NE BOUNDARY,
2 FEB 06**



**PHOTOGRAPH 21.
FADED FDEP (FDER)
SIGN NEAR DITCH, NE
OF KOPPERS**

ATTACHMENT 5

INTERVIEW RECORDS

| INTERVIEW RECORD | | | |
|--|--|---|----------------------------------|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | | Time: | Date: 30 Jan, 1, 2 Feb 06 |
| Type: <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input checked="" type="checkbox"/> Other Location of Visit: Cabot Carbon/Koppers Site | | <input type="checkbox"/> Incoming <input checked="" type="checkbox"/> Outgoing | |
| Contact Made By: | | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers | |
| Individual Contacted: | | | |
| Name: John Mousa | Title: Pollution Prevention Manager | Organization: Alachua County Environmental Protection Department | |
| Telephone No: 352-264-6805 Fax No: 352-264-6852 E-Mail Address: jjm@alachua.fl.us | | Street Address: 201 SE 2 nd Ave, Suite 201 City, State, Zip: Gainesville FL 32601 | |
| Summary Of Conversation | | | |
| <p>The information in this interview record was obtained during the site visit at Koppers and Cabot Carbon on February 1 and 2, 2006, during one telephone conversation on 30 January 2006, and some emails in February 2006.</p> <p>John explained that ACEPD (through the efforts of himself and Robin Hallbourg) has been monitoring on-site activities at the Koppers portion of the Cabot Koppers superfund site as well as providing technical review of documents and conveying local environmental concerns to USEPA Region 4. John keeps a running chronology of site events and concerns, which is available on Alachua County's website.</p> <p>John receives calls from the public requesting status updates and progress on investigations and remediation of the Koppers site. John stated that he would like to see more public meetings or information to the public from USEPA to the local community to explain progress at the Koppers superfund site. John has received calls regarding obnoxious odors near the Cabot Carbon lift station and the sumps on North Main Street near the Dodge dealership. The odor nuisance calls seems to be more prevalent after heavy rains. John is concerned about the odors near the sumps and lift station, and is in favor of action being taken to reduce the odors, and in favor of another air sampling and analysis event at the lift station especially during the summer or hotter months of the year.</p> <p>John is concerned about the accuracy and QA of some of the water sampling and analysis of the new Floridan wells. John outlined his concerns to EPA and Beazer. Although some concerns were addressed to his satisfaction, there still seems to be a problem with emulsions that may cast some uncertainty on the reliability of the phenolic compound concentrations measured. John, on behalf of Alachua Co., recommends that Beazer be careful about making generalized statements or conclusions about increasing or decreasing concentrations or trends until enough data is obtained. Also more care needs to be taken by the laboratory in doing the extractions to minimize emulsion formation. At the same time the surrogate recovery information is one of the primary tools to judge the quality of the</p> | | | |

Summary Of Conversation, cont'd

data obtained. When these recoveries are less than 10% for several of the surrogates as in the earlier 1st Qtr sampling by RETEC, it casts doubt on the validity and defensibility of all the data.

John feels that some progress toward investigating possible remedial alternatives for source treatment or removal that were being made over the past couple of years at the Koppers site has been delayed (in March 2005 or thereabouts) by the more recent focus shifting to the Floridan well installation program and the concern about Floridan contamination. While John agrees that the resolving Floridan issue is important, he would like to see progress on developing remedial alternatives and some of the pilot studies resumed or concluded. One example is the source removal and onsite treatment option. John feels the source areas need to be addressed. Alachua County disagreed with Beazer that source removal options are infeasible.

John indicated that ACEPD had expressed to USEPA and continues to believe that investigation of contamination in the Hawthorn (Intermediate) aquifer to the west of the Koppers site needs to be performed. He believes that there has been an inadequate investigation of the Hawthorn to the west of the site especially considering that contamination was detected in a private offsite well adjacent to the western Koppers site boundary. This well has since been abandoned.

John also wants the signage issue resolved near a drainage ditch off of N. Main Terrace which is offsite to the North of the Koppers property. The FDEP signs along the ditch are very old and faded, and either need to be replaced or taken down. However, sampling to confirm or dismiss contamination needs to be performed to establish proper signage action.

| INTERVIEW RECORD | | |
|--|-------------------------|--|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 |
| Subject: 5 year review | | Time: Date: 1,2 Feb 06 |
| Type: <input type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input type="checkbox"/> Other Location of Visit: Koppers site, Cabot Carbon site | | <input type="checkbox"/> Incoming <input type="checkbox"/> Outgoing |
| Contact Made By: | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers |
| Individual Contacted: | | |
| Name: Kelsey Helton, Hazardous Waste Clean Up | Title: Geologist | Organization: Florida Department of Environmental Protection |
| Telephone No: 850-245-8969 | | Street Address: 2002 Old St. Augustine Rd, Old St. Augustine Rd Office Park, Bldg D City, State, Zip: Tallahassee FL 32301 |
| Fax No: 850-245-8976 | | |
| E-Mail Address: Kelsey.helton@dep.state.fl.us | | |
| Summary Of Conversation | | |
| <p>The information in this interview record was obtained during the site visit at Koppers and Cabot Carbon on February 1 and 2, 2006.</p> <p>The odors at the Cabot Carbon lift station are a concern. Kelsey discussed the Ambient Air Quality Impact Assessment performed in May 2005 on the air inside the lift station. Low levels of toluene, naphthalene, and ethyl benzene were detected. The results were below EPA's risk-based criteria. Phenol was detected at 0.184 mg/L. The PEL is 19 mg/L; the risk-based level is 1.0 mg/L. This results in a detectable odor, but well below risk-based criteria. Kelsey is concerned about an odor nuisance issue. Air monitoring may need to be conducted in areas of the sumps, and air sampling may need to be conducted at the lift station vent. Another air sampling and analysis event conducted in the summer over a larger number of days is recommended. Kelsey also recommended a carbon air treatment system to be installed in the lift station to help reduce odors. A pilot study on the air quality to determine the type of system to install was suggested. The constituent causing the primary odor nuisance (phenol?) should be established. Biweekly monitoring and carbon change out is suggested as a reasonable estimate of what may be expected for an air treatment system.</p> <p>Kelsey also discussed the addition of the effluent water quality results in the monitoring reports.</p> <p>Kelsey also discussed including in the recent Gradient report, the screened intervals of the wells. During the discussion on site about the trench design, the bottom depth of the trench, the depth to the bottom of the surficial aquifer, and the depths of the various monitoring wells on Cabot, the inclusion of the screened intervals of the wells in Table format in the report was suggested.</p> <p>Kelsey is also concerned about the lack of Hawthorn wells and the potential for offsite migration of contaminated groundwater in the Intermediate aquifer (Hawthorn) from both sites.</p> | | |

Summary Of Conversation, cont'd

The ditch downgradient of Koppers was also visited and discussed. This ditch discharges into Springstead Creek. The original remedy concluded there was no risk posed by surface water (therefore NFA). Recent concerns about the potential for contamination in the ditch have surfaced. 'Bleb's in the ditch sediments have been reported. The ditch is downgradient from Koppers. A Koppers downgradient monitoring well in the surficial aquifer, MW-33B, just upstream from the ditch and outfall, is contaminated with naphthalene. (This is in the Dec 2004 monitoring report from the Koppers site, which is the most recent available quality analysis results. The November/December 2005 sampling and analysis results may not be available for a few more months.)

Kelsey also recommended that all surficial wells be sampled, and the arsenic plume on the Koppers site be mapped.

The FDEP signs near the creek are very faded. If the sediments and surface water are contaminated, new signs should be posted.

Kelsey is also concerned about the lack of Hawthorn wells north of the former Cabot lagoons; the lack of an entire suite of sampling for COC's from both sites. Due to the high temperatures in the retort waste stream that was discharged into the lagoons, enhanced migration of contaminants from the Cabot site deeper into the subsurface (i.e. Hawthorn) is a possibility.

INTERVIEW RECORD

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|---|--|--|---|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | | Time: 10 a.m.; and 10:30 a.m. | Date: 2 Feb 06; and 17 Feb 06 |
| Type: <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input type="checkbox"/> Other Location of Visit: Cabot Carbon | | <input type="checkbox"/> Incoming <input checked="" type="checkbox"/> Outgoing | |
| Contact Made By: | | | |
| Name: Laura Roebuck | | Title: Geologist | Organization: US Army Corps of Engineers |
| Individual Contacted: | | | |
| Name: Bill Campbell | | Title: O&M manager and technician for Cabot Carbon | Organization: consultant for Weston Solutions, Inc. |
| Telephone No: 352-495-3282 | | Street Address: 5430 Metric Place, Suite 100 | |
| Fax No: | | City, State, Zip: Norcross GA 30092-2550 | |
| Summary Of Conversation | | | |
| <p>Bill is the onsite manager of the Cabot Carbon groundwater interceptor trench system, and other misc issues at the site. Bill participated in the site visit of Cabot Carbon on 2 Feb 2006. Most of the information in this interview record is from a telephone conversation on 17 February 2006.</p> <p>Bill explained his biweekly O&M operations. He repairs all the electrical problems, and contracts out any other necessary repairs. He also supervises other on-site maintenance issues, such as the well abandonment years ago at Cabot (in parking lot), the annual (now bi-annual) sump cleanout, etc. Bill does not think the odor problems are too bad at the lift station or the sumps.</p> <p>Bill did not mention any problems or concerns with the site.</p> <p>Bill mentioned that he has recently started some trials using carbon filters in the vent at the lift station. He will be experimenting with different carbon filters, thicknesses, etc. to determine what will work to reduce foul odors at the lift station.</p> <p>During the site visit, the rusting of the interior of the previous lift structure was discussed. Bill explained that the high degree of rusting was caused from the excessive moisture and lack of air flushing because of the enclosed structure, combined with the low contaminant levels in the air caused the rusting. He did not feel it was anything that warrants concern.</p> | | | |

INTERVIEW RECORD

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|---|-----------------------------|---|-------------------------------------|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | | Time: 10 a.m.; 12:30 p.m. | Date: 2 Feb 06; 17 Feb 06 |
| Type: <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input type="checkbox"/> Other Location of Visit: Cabot Lift station (at Gainesville Dodge Dealership) | | <input type="checkbox"/> Incoming <input checked="" type="checkbox"/> Outgoing | |
| Contact Made By: | | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers | |
| Individual Contacted: | | | |
| Name: David Tindale | Title: Sales Manager | Organization: Gainesville Dodge | |
| Telephone No: 352-372-4343 Fax No: 352-377-2829 E-Mail Address: sales@gainesvilledodge.com | | Street Address: 3000 N. Main Street City, State, Zip: Gainesville FL 32609 | |
| Summary Of Conversation | | | |
| <p>This interview record is predominantly from the telephone conversation on 17 Feb 2006 with David Tindale, the sales manager at Gainesville Dodge. A small portion of the information in this record is from the visit at the lift station site with Andy Johnson, the Gainesville Dodge Manager.</p> <p>David has been at the Dodge Dealership for many years. He was there when the Northeast Lagoon sediments were excavated.</p> <p>Structure (around the lift station) was rebuilt a year ago. The physical part looks great. They never see anything outside the building. Just very strong odor in the area from the lift station. There were great concerns regarding the severe corrosion of the interior of the previous lift station, and the adjacent chain link fence. The galvanized steel fence was completely rusted out and the interior of the former building was also severely rusted. The severity of the rusting concerned lots of folks in the area.</p> <p>David lived in Gainesville when the lagoons were breached in 1967. His friend rode his bike through Hogtown Creek near 39th Ave shortly after the lagoon breach of 1967, and his friend and bike were covered in creosote. This was about 2 or 3 miles downstream from the breach.</p> <p>Fumes have been more pungent lately. The odors used to linger just around the lift station, but the odors are now hanging under the eaves of the dodge dealership building, and on occasion the odors are inside the building. The odors have been stronger over the past year than in previous years. 2004 and previously, the odors would not accumulate inside the building.</p> <p>David thinks the odors are worse in the evenings and early in the morning.</p> | | | |

INTERVIEW RECORD

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|--|-------------------------------|--|-----------------------|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | | Time: | Date: 2 Feb 06 |
| Type: <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input type="checkbox"/> Other Location of Visit: Cabot Carbon site | | <input type="checkbox"/> Incoming <input checked="" type="checkbox"/> Outgoing | |
| Contact Made By: | | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers | |
| Individual Contacted: | | | |
| Name: Ralph McKeen | Title: Project Manager | Organization: Weston Solutions, Inc., consultant for Cabot Carbon | |
| Telephone No: 770-325-7900 | | Street Address: 5430 Metric Place, Suite 100 | |
| Fax No: | | City, State, Zip: Norcross, GA 30092 | |
| E-Mail Address: Ralph.McKeen@WestonSolutions.com | | | |
| Summary Of Conversation | | | |
| <p>Ralph participated in the site visit for Cabot Carbon on 2 February 2006. Other participants were Bill Campbell of Weston Solutions, Kelsey Helton of FDEP, John Mousa of ACEPD, Laura Roebuck of USACE, and Amy McLaughlin of EPA Region 4. We met near the lift station at the Dodge Dealership. The structure around the lift station was replaced in January 2005. The original structure was damaged by hurricanes in 2004. The lids over all the sumps were also replaced last year.</p> <p>We walked the length of the trench. Cabot will start cleaning out the sumps and pump station twice a year. The cleaning is currently done annually. They are implementing this in an effort to help reduce the odors. Ralph briefly discussed the air quality sampling and analysis that was conducted last year. It is referred to as the Ambient Air Quality Impact, conducted in May 2005. The samples were collected inside the lift station. The results are below EPA risk-based criteria.</p> <p>Ralph said he receives odor complaints from the Dodge dealership frequently.</p> <p>Ralph said the raw water is pumped directly to GRU. He said the raw water quality is sampled and analyzed 3 times per year.</p> <p>Ralph explained the protectiveness of the trench, with the upward gradient of the water in the surficial aquifer into the trench. The evidence is the clean downgradient wells, WMW-18E and 17E.</p> | | | |

| INTERVIEW RECORD | | |
|--|---------------------------|--|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 |
| Subject: 5 year review | | Time: various Date: 30 Jan, 1 & 3 Feb 2006 |
| Type: <input checked="" type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input type="checkbox"/> Other Location of Visit: Koppers site | | <input type="checkbox"/> Incoming <input checked="" type="checkbox"/> Outgoing |
| Contact Made By: | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers |
| Individual Contacted: | | |
| Name: Mike McKinney | Title: O&M Manager | Organization: consultant for Beazer, Inc |
| Telephone No: 352-375-5829 Fax No: E-Mail Address: mhmckinney@bellsouth.net | | Street Address: City, State, Zip: Gainesville, FL |
| Summary Of Conversation | | |
| <p>Mike is the primary manager of the O&M of the groundwater containment system and the Floridan aquifer monitoring. Mike expressed concern with the source areas at the site. He is concerned about the lack of management, and closure. He did not indicate any problems with the groundwater treatment system.</p> <p>Mike conducted the site visit at the Koppers portion of the site, and provided all the O&M documentation, safety plans, monitoring reports, discharge compliance reporting records, NOV's, etc.</p> <p>The North Lagoon was visited first during the site visit. A set of Hawthorn nested wells are near the lagoon. The deeper Hawthorn well here does not have contamination. The shallower Hawthorn well (60' deep) does have contamination. Mike bails DNAPL from 5 wells around the site, recovering about 0.2 gallon of DNAPL per well per week. The sampling interval recently changed from weekly to every two weeks. Now the recovery is 0.4 gallon every sampling event.</p> <p>Mike said there are a total of 88 wells; surficial, extraction and monitoring. These wells are gauged quarterly.</p> <p>The drip track area was visited. It was noted that new light poles had been installed, with underground power lines, running through the drip track area, which is one of the more contaminated parts of the entire Koppers site.</p> <p>A new Floridan aquifer well was being installed in the drip track area, FW-21B. The soil cuttings from this well had to be transported off site and incinerated.</p> | | |

Summary Of Conversation, cont'd

The current wood treating operations do not use creosote to treat the wood. CCA is used instead. Creosote logs are stockpiled at the site, treated and brought in from elsewhere.

Mike is also handling the cuttings and water disposal of the current Floridan aquifer well drilling and installation. The drums are stored in the water treatment plant area. Mike composites the soil, and characterizes. Once the analysis is obtained, Mike labels the drums and takes to landfill.

The 14 shallow extraction wells are all about 30' deep, and they pump an average of 3 gpm, 24 hours/day. Extraction well EW-13 was abandoned before 2000 because the yield had dropped to about 0.5 gallon per minute. EW-16 was installed between EW-17 and EW-15, and the groundwater from this well has high levels of Arsenic. EW-17 and EW-15 do not have Arsenic contamination (or very low levels). It was noted that EW-16 is also directly downgradient of the CCA chemicals storage area. The Arsenic in the water from well EW-16 must be treated before shipping to the POTW. The Ferric Chloride treatment system was installed to treat the Arsenic in well EW-16.

Mike said the results of the raw water quality discharge were good, and no issues of concern were identified. Sampling and analysis of the raw water being discharged from the treatment system is analyzed three times per year, with GRU participating jointly with the sampling and analysis once a year. The samples are collected at the outfall. Caustic soda must be added to the water before transporting to POTW because it is too close to the limit for the POTW which is 5.5. About 30 gpm of effluent is discharged to the POTW.

INTERVIEW RECORD

| | | |
|--|---|-----------------------|
| Site Name: Cabot Carbon/Koppers Superfund Site | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | Time: | Date: 2 Feb 06 |
| Type: <input type="checkbox"/> Telephone <input checked="" type="checkbox"/> Visit <input type="checkbox"/> Other Location of Visit: Cabot Carbon site, and nearby vicinity | <input type="checkbox"/> Incoming <input type="checkbox"/> Outgoing | |

Contact Made By:

| | | |
|----------------------------|-------------------------|---|
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers |
|----------------------------|-------------------------|---|

Individual Contacted:

| | | |
|---------------------------|--|---|
| Name: John Herbert | Title: Geologist, Senior Dept Mgr | Organization: Jones Edmunds & Assoc. |
|---------------------------|--|---|

Telephone No: 352-377-5821, ext 5332

Fax No: 352-377-3166

E-Mail Address: jherbert@jonesedmunds.com

Street Address: 730 NE Waldo Rd

City, State, Zip: Gainesville, FL 32641

Summary Of Conversation

John expressed concern with the lack of protectiveness of the partial remedies currently in place in general, and the potential for contamination of the Floridan aquifer due to the recent contamination found in the Hawthorn and Floridan aquifer wells on site. Groundwater modeling conducted by the GRU DNAPL Team indicates that neither the groundwater extraction system at Koppers nor the Interceptor Trench and ditch at Cabot Carbon are adequately containing contaminated groundwater on the Superfund Site.

John expressed concern that:

- DNAPL beneath the Koppers Site is potentially mobile in the Surficial, Hawthorn, and Floridan.
- Much more information regarding the stratigraphy and contaminant distribution within the Hawthorn Group, especially near the source areas, is required in order to develop a plan to prevent lateral and vertical migration.
- High arsenic concentrations are reported in Surficial aquifer monitoring wells at the Koppers Site but the vertical and horizontal extent of that plume have not been delineated.
- Potential impact to the Murphree Wellfield from phenol contamination in groundwater may be unrelated to toxicity. Phenol concentrations in water, even very low concentrations, can cause odor problems when the water is chlorinated. If phenol or chlorophenol contamination in the Floridan groundwater reaches the Murphree wells, there is a concern that taste and odor problems may result in the treated water supply from the reaction with chlorine. He believes that the cleanup goal for phenol and phenolic compounds must protect against potential taste and odor problems.
- There is potential for discharge of groundwater contaminated by creosote constituents and arsenic to the ditch downgradient of the Koppers site. He agrees that sediment and water samples in this ditch should be collected and analyzed for the COC's.

Summary Of Conversation, cont'd

John believes that, in light of the history of the investigations at the Koppers Site and the newly acquired knowledge of contaminant migration at that site, that the Cabot Carbon Site should be reevaluated regarding the potential for the presence and migration of DNAPL and the potential for downward migration of contaminated groundwater into the Hawthorn Group and then into the Floridan.

The Team is currently compiling a report that will provide a review of existing data and make recommendations for filling data-gaps so the upcoming Koppers Feasibility Study can adequately protect the Murphree Wellfield. Evidence of DNAPL and possibly LNAPL at the former Northeast Lagoon (Cabot Carbon Site) is presented in the report.

INTERVIEW RECORD

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|---|-------------------------------------|--|----------------------------|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | | Time: | Date: 13 March 2006 |
| Type: <input type="checkbox"/> Telephone <input type="checkbox"/> Visit <input checked="" type="checkbox"/> Other Location of Visit: | | <input type="checkbox"/> Incoming <input type="checkbox"/> Outgoing | |
| Contact Made By: | | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers | |
| Individual Contacted: | | | |
| Name: Mike Slenska | Title: Environmental Manager | Organization: Beazer East, Inc. | |
| Telephone No: 412-208-8867 | | Street Address: c/o Three Rivers Management Co One Oxford Centre, Suite 3000 City, State, Zip: Pittsburgh PA 15202 | |
| Fax No: 412-208-8869 | | | |
| E-Mail Address: mike.slensk@hanson.biz | | | |
| Summary Of Conversation | | | |
| <p>Mr. Slenska has been working on the Site as Beazer's Environmental Manager since May 2001 (about the time the proposed Plan fact sheet was issued by EPA). Mr. Slenska has been working as an Environmental Manager for the company since 1993.</p> <p>Mr. Slenska believes that Beazer is doing everything possible to move the project forward toward a final Site remedy. Mr. Slenska pointed to the number of activities completed and the amount of money Beazer has spent over the past five years attempting to redefine the Site conceptual model and understand any potential risks that the Site may pose, particularly any potential risks to GRU's Murphree Wellfield due to historic Site impacts.</p> <p>Mr. Slenska described that since questions were raised at the May 2001 public meeting Beazer has spent over \$4.5 million installing new Hawthorn Group and Floridan aquifer monitoring wells, identifying and sampling private wells near the Site, abandoning a number of old monitoring wells that might have been allowing leakage from the Surficial zone or upper part of the Hawthorn Group to the lower part of the Hawthorn Group, conducting a Source Area delineation effort, completing a comprehensive Site groundwater model, examining Source zone removal for the Surficial zone, submitting a number of interim remedial measure pilot study work plans, etc.</p> <p>Mr. Slenska discussed that the work conducted over the past several years has allowed a more thorough and accurate conceptual model to be developed for the Site. Additionally, it seems clear that the Murphree Wellfield is not at risk of being impacted by historic Site impacts.</p> | | | |

Summary Of Conversation, cont'd

Mr. Slenska expressed concern that EPA appears to be relying heavily on the technical opinions of consultants hired by GRU. Mr. Slenska stated that he believes that GRU's consultants have utilized unrealistic assumptions to theorize unrealistic potential risks to GRU's Murphree Wellfield.

Mr. Slenska also expressed concern regarding the ongoing Floridan monitoring well installation program where EPA required Beazer to install a number of Floridan monitoring wells extremely close to Site source zones. Mr. Slenska is concerned that the installation of these wells may create potential pathways for constituent migration from the Hawthorn Group to the Floridan aquifer due to the vertical head difference between these two hydrogeologic units.

General Comments/Concerns

Mr. Slenska believes Beazer has been acting responsibly to address the historical environmental issues associated with the Site. Beazer is also committed to working with all environmental agencies and GRU to continue implementing a scientific approach to investigating the Site, completing the analysis to help determine potential options for remediation and implementing an appropriate remedy for the Site.

Mr. Slenska stated his concern that EPA may ultimately require remedial actions at the Site that are based more on perceived potential risks rather on scientifically substantiated potential risks. Mr. Slenska continued by stating that any unwarranted remedial actions that may be required may inadvertently exacerbate Site impacts.

INTERVIEW RECORD

| | | | |
|---|---|---|------------------------|
| Site Name: Cabot Carbon/Koppers Superfund Site | | EPA ID No.: FLD980709356 | |
| Subject: 5 year review | | Time: | Date: 3/13/2006 |
| Type: <input type="checkbox"/> Telephone <input type="checkbox"/> Visit <input checked="" type="checkbox"/> Other Location of Visit: | | <input type="checkbox"/> Incoming <input type="checkbox"/> Outgoing | |
| Contact Made By: | | | |
| Name: Laura Roebuck | Title: Geologist | Organization: US Army Corps of Engineers | |
| Individual Contacted: | | | |
| Name: Wayne Reiber | Title: Mgr. Environmental Assessment & Remediation | Organization: Cabot Corporation | |
| Telephone No: (617-342-6023) Fax No: 617-342-6018 E-Mail Address: Wayne_Reiber@cabot-corp.com | | Street Address: Two Seaport Ln, Suite 1300 City, State, Zip: Boston MA 02210 | |
| Summary Of Conversation | | | |
| <p>Wayne Reiber is Manager of Environmental Assessment and Remediation for Cabot Corporation and has been working on the Gainesville Site since April 1987 (19 years).</p> <p>The installation of the groundwater interceptor trench over 10 years ago has worked remarkably well in managing and remediating contamination associated with the historical Cabot Carbon operation and the northeast lagoon. Coupled with the removal of almost 4700 tons of contaminated soil from the northeast lagoon, which Cabot never owned or operated but voluntarily excavated, the remedy has achieved a substantial reduction of contaminant toxicity and volume. Accordingly, there are no specific or even general concerns regarding the effectiveness of the remedy for the Eastern Portion of the site. It is important to recognize that the Cabot Carbon interceptor trench was never intended or designed as a remedy for contamination originating from the adjacent Koppers facility, although it was recognized that some dissolved phase contaminants associated with that operation that migrated beyond Koppers eastern property boundary before the implementation of the Koppers groundwater remedy were expected to find their way into the groundwater interceptor trench.</p> <p>A comprehensive review and evaluation of the significant amount of data available from over 20 years of assessments, confirmation studies and post-remedial action monitoring at the Eastern Portion of the Site indicates that remedial actions undertaken have been effective in remediating contamination associated with the former Cabot Carbon operation and continue to remain protective of human health and the environment.</p> | | | |

Summary Of Conversation, cont'd

Notably:

- Groundwater elevations and groundwater quality data collected along and downgradient of the interceptor trench indicate that the trench is effectively capturing groundwater from the surficial aquifer;
- Groundwater concentrations at monitoring wells throughout the Eastern Site continue to decline; and
- Groundwater concentrations for pine processing compounds at the former Cabot Lagoons continue to comply with ROD-specified groundwater cleanup goals.

Furthermore, an examination of soil and groundwater quality data indicates that no DNAPL is expected to be present at the former Cabot property and that although a limited quantity of residual NAPL may be present at the water table at the Northeast Lagoon, DNAPL is not likely to be present.

ATTACHMENT 6

PUBLIC NOTICE OF FIVE-YEAR REVIEW



U. S. Environmental Protection Agency
Region 4
Announces
Cabot/Koppers Superfund Site
Second Five Year Review

Purpose/Objective: Pursuant to Section 121 of CERCLA, as amended by the Superfund Amendments and Reauthorization Act (SARA), the United States Environmental Protection Agency (EPA) is conducting a five-year review for the Cabot/Koppers Superfund Site. The objective of the review is to ensure that the selected remedy continues to protect human health and the environment.

Site Background: The Cabot/Koppers Site is comprised of two sites, the Cabot Carbon Site and the Koppers Site. The mailing address is 200 NW 23rd Ave, Gainesville, Florida 32609. The Cabot facility operated as a pine tar and charcoal generation facility prior to 1967. The facility on the Koppers property, currently operated by Koppers Industries, has been an active plant since 1916 and has been used primarily to preserve wood utility poles and timbers. Both sites have been contaminated with dense non-aqueous phase liquid (DNAPL) waste.

Cleanup Action: EPA began environmental assessment at the Site in 1982, listed the Site on the National Priorities List (NPL) in 1984, and issued a Record of Decision (ROD) in 1990. Remedial actions specified in the ROD for the Cabot Site were an interceptor trench and excavation/disposal of contaminated sediments. The interceptor trench was initially installed as a surface water interceptor in 1985, and the trench was completed in 1995, allowing contaminated groundwater to be intercepted from the shallow aquifer and discharged to a Publicly Owned Treatment Works (POTW). Excavation/disposal of contaminated sediments was completed in 1994. Remedial actions specified in the ROD for the Koppers property were installation of a groundwater pump-and-treat system in the surficial aquifer and removal of contaminated soils. The groundwater pump and treat system, installed in 1995 to maintain hydraulic containment in the surficial aquifer, continues to operate at the site. Removal of contaminated soils has not taken place at the Koppers Site. The first Five Year Review for the Site was signed on March 23, 2001.

Five-Year Review Schedule: The five-year review process, which began in 2005, is being conducted to evaluate the effectiveness of remedial measures in place at the site. The five-year review process includes a review of data and information, inspection of the site and community interviews. These activities will assist in the determination of whether the selected remedy remains protective of human health and the environment. Site inspection and community interviews are planned for February 2006. Completion of the five-year review process is expected in Spring 2006.

Contact Information: If you have any questions, comments and/or concerns about the five-year review, you may contact the following:

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