

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4



61 Forsyth Street  
Atlanta, Georgia 30303-3104

July 21, 2009  
Ms. Karen Fromme  
Senior Scientist  
Field and Technical Services  
200 Third Avenue  
Carnegie, PA 15106

Dear Ms. Fromme:

Thank you for the October 13, 2008, "Comprehensive Groundwater Monitoring, Sampling, and Analysis Plan for the Koppers Gainesville, Florida Superfund Site." Our comments on the submittal are as follows:

1. It should be understood that monitoring performed in accordance with this plan (or monitoring done in accordance with any plan that applies to the Koppers portion of the Site (Beazer responsibility)) may be modified, as necessary, based on the remedial actions selected to address ground-water contamination at the Koppers property. Either remedial actions that require abandonment of certain monitoring wells included in the monitoring program, or remedial actions taken on the Koppers property may lead to a decision by EPA, in consultation with other stakeholders, that additional monitoring wells are required. We see the October 13, 2008, submittal as a proposed baseline program to be amended or added to, as remedial actions take place which would change the wells available for monitoring, would modify groundwater flow patterns, and affect the distribution of contaminants in the aquifer.
2. We have two recommendations regarding the Table 2-1 selection of wells for arsenic and pentachlorophenol monitoring:
  - a. Well M-9BR should be added to the list of wells for arsenic monitoring. This well yielded a sample with 7.3 micrograms per liter (ug/L) of arsenic when it was sampled in August 2007. Arsenic has previously been detected at this location, at a somewhat comparable concentration. Beazer, through their consultant, has indicated that at some time, they envision phasing out capture of surficial aquifer ground water along the property line and restricting surficial aquifer remediation to interior areas closer to the identified principal contaminant source areas (GeoTrans document addressed to Amy McLaughlin, December 2006). There is a recovery well close to M-9B where the arsenic concentration in recovered

groundwater has exceeded the 10 ug/L arsenic drinking-water MCL.

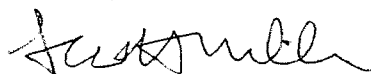
Given the possibility that eventually, recovery of ground water in the vicinity of M-9BR will be stopped and that arsenic is present in samples from that well and is present in above-MCL concentrations close to M-9BR, it may be useful to have additional arsenic monitoring data from that well in order to fully establish baseline conditions in that area, for comparison to any ground-water quality data that may be needed in this area once the extraction well operations stop.

- b. Monitoring at M-16B should include pentachlorophenol (PCP). While neither M-16B nor companion well M-16A yielded an August 2007 sample containing measurable PCP, PCP was detected (1J ug/L) in a December 2007 sample from nearby recovery well EW-13 and was present at a concentration of 19 ug/L at M-17 (August 2007). M-17 is a monitoring well close to recovery well EW-14, where 2.5 J ug/L was detected in the December 2007 sample. In the event that groundwater recovery efforts end at EW-13 and EW-14, it may be important to have a continuing baseline record of PCP at M-16B for comparison monitoring in that area after recovery well operations end.
3. Tables 5-3, 5-4, and 5-6 include a column labeled "Reporting Limit." The "reporting limits" shown on these tables are values in excess of detected concentrations (either confirmed or estimated) that have been noted in previous monitoring reports and that are reportable using the selected analytical method. EPA requests that all concentration data with a confirmed or estimated contaminant concentration be reported in data tables submitted as a part of the ongoing monitoring programs, regardless of the concentration of that contaminant relative to some regulatory standard or guidance concentration value.
4. We recommend the following changes to the proposed Floridan aquifer monitoring program (Table 2-3):
  - a. For Floridan multilevel well FW-21B, sample all four zones semiannually because of exceedances of the 1 ug/L benzene maximum contaminant level (MCL) on multiple occasions in all zones.
  - b. Continue monitoring FW-6 on a semiannual basis until the time at which it is abandoned, is otherwise unavailable for monitoring, or contamination at this well is proven to be a result of an artificial vertical contaminant transport mechanism.
  - c. Increase the monitoring frequency to semiannually at any applicable annual sampling wells/zones where either the concentration of a contaminant increases from below a groundwater clean-up target level (GCTL) to above a GCTL, or where successive annual samples show an increasing concentration of any contaminant, regardless of the specific

- concentrations observed.
- d. Continue monitoring arsenic on an annual basis at all boundary monitoring well zones where the most recent sample result indicated the arsenic concentration exceeded its 10 ug/L MCL. Monitor arsenic at the new sentinel wells on a quarterly basis until it is either confirmed by two successive sampling events that arsenic is not detected at a particular monitoring location or it is confirmed by four successive sampling events that the arsenic concentration, where present, consistently does not exceed the 10 ug/L MCL.
5. Section 2.3 paragraph 3 refers to 10 new Hawthorn monitoring wells that will initially be sampled quarterly. The specific wells that are under consideration need to be identified. Table 2-2 proposes 16 Hawthorn wells for quarterly sampling.
  6. Section 2.3 paragraph 3 states, with respect to the six Hawthorn wells with proposed annual sampling, "Therefore these six on-Site wells will initially be sample annually for four events." The text needs to explain, if appropriate, what actions might be then taken once the initial four years of data are obtained. The statement may also need to be revised.
  7. Referring to Section 5.1.1, will Floridan aquifer water level measurements be made at all of the monitoring wells/zones and will water level data be obtained from existing single-zone monitoring wells not included in the water-quality monitoring program? The Section 5.1.1 text should note that details of the Westbay water-level monitoring are included in Section 5.4 and a statement about the specific wells/zones to be included in the water-level monitoring program should be added to Section 5.4.
  8. We request that for all future monitoring performed as a part of this (or any other monitoring program for the Koppers portion of the Site), data be made available to EPA in an electronic data format that can be manipulated (e.g. a spreadsheet-not as a PDF file that cannot directly be utilized for independent data evaluation).

If we may be of assistance in this matter, please contact me at (404) 562-9120 or via Internet e-mail at [miller.scott@epa.gov](mailto:miller.scott@epa.gov).

Sincerely,



Scott Miller  
Remedial Project Manager  
Superfund Remedial Branch, Section C