



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

61 Forsyth Street

Atlanta, Georgia 30303-3104

November 6, 2014

Mr. Wayne Reiber, P.E.

Manager

Environmental Assessment and Remediation

Corporate Safety, Health and Environmental Affairs

Cabot Corporation

Two Seaport Lane, Suite 1300

Boston, MA 02210

Dear Mr. Reiber:

Thank you for the October 16, 2014, Work Plan for Supplemental Hawthorn Group Characterization, Cabot Carbon/Koppers Superfund Site, Gainesville, Florida.

Quality Assurance Project Plan (QAPP) Submittal

Please provide a Quality Assurance Project Plan in support of this Work Plan. The previous QAPP submittal is in excess of fifteen years old, and no longer meets the data collection requirements necessary for this effort in the Hawthorn Group and Upper Floridan Aquifer. A QAPP checklist that the Region utilizes in evaluating QAPPs is included as an enclosure to this letter to assist Cabot in this effort.

2.1 Supplemental Upper HG Investigation in the Former Processing and Storage Area

The following language is included related to the potential find of DNAPL during drilling in the surficial aquifer:

“The borings will first be advanced to the base of the surficial aquifer. The decision to advance the borings into the Upper HG will be contingent on the absence of any evidence of DNAPL presence (visual observation of DNAPL globules, seeps, and ganglia; visual evidence of DNAPL on drilling equipment; and positive hydrophobic dye tests) within the surficial aquifer. If DNAPL is found within the surficial aquifer, the boring will be abandoned in the surficial aquifer and immediately grouted. A new boring at a nearby location will be advanced. If evidence of DNAPL is not found, the boring will be advanced into the Upper HG and soil cores will continue to be retrieved and examined for lithology, visual evidence of DNAPL presence, and positive hydrophobic dye tests. If evidence of DNAPL is found in the Upper HG, the boring will be **abandoned and immediately grouted. In this event, a step-out location will not be selected.**”

At the top of page 3 of the Work Plan, the text needs to indicate what will happen if the second boring also encounters NAPL in the surficial aquifer. The proposed approximate proximity of the second boring to the initial boring should also be noted. EPA expects that all three proposed borings will ultimately be completed to their full depth somewhere in the vicinity of the proposed boring locations.

Our strong preference is to simply identify a step-out location nearby, and continue the boring installation. We will work with you in the field to address this in an expedited fashion should such an event occur.

2.3 Permanent Floridan Monitoring Well Installation and Sampling

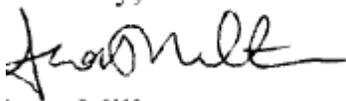
The second paragraph of Section 2.3 states that the location of the new Floridan aquifer well will be contingent upon the absence of groundwater contamination at the proposed adjacent Hawthorn monitoring wells. Is the presence of any contamination whatsoever in the groundwater monitored by these wells sufficient to trigger shifting the Floridan well location, or can some small amount of contamination in the Hawthorn be tolerated? If the latter case applies (and it is probably a reasonable position), there should be some indication as to what the upper tolerable levels of different groundwater contaminants would be in each of the Hawthorn Group monitoring zones.

Table 1 Groundwater and Sampling Analysis Plan

Table 1 should be updated to include reporting all analytes for each analytical method applied. For instance, Analytical EPA Method 6010 produces all metals in a groundwater sample. All of these analytes must be reported.

We look forward to working with you on implementing remedial action at the Cabot Carbon portion of the Cabot Carbon/Koppers Site.

Sincerely,



Scott Miller
Remedial Project Manager
U.S. Environmental Protection Agency

Enclosure