



Alachua County Environmental Protection Department

Chris Bird, Director

December 21, 2004

Ms. Amy Williams
Remedial Project Manager
Superfund Remedial and Technical Support Branch
Waste Management Division
EPA Region 4
61 Forsyth St., S.W.
Atlanta, GA 30303 – 8960

Re: ACEPD Comments on Addendum 7: Groundwater Flow and Transport Model Draft Report, Cabot-Koppers Superfund Site, Gainesville Florida –October 5, 2004 and Preliminary Floridan Aquifer Water Quality Data Transmitted 12/20/2004

Dear Ms. Williams:

The Alachua County Environmental Protection Department (ACEPD) is enclosing as Attachment 1 with this letter specific comments and recommendations concerning the above referenced Draft Flow and Transport Model and data reports for the Koppers Superfund Site.

If you have any questions about these comments please contact me or Robin Hallbourg at 352-264-6800.

Sincerely,

John J. Mousa, Ph.D
Pollution Prevention Manager

CC: Mike Slenska, Beazer East, Inc.
Kelsy Helton, FDEP
Robin Hallbourg
John Mousa

Brett Goodman, GRU
Paul Myers, ACHD
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Attachment 1: ACEPD Comments Dated 12/20/2004 on Addendum 7: Groundwater Flow and Transport Model Draft Report, Cabot-Koppers Superfund Site, Gainesville Florida –October 5, 2004 and Preliminary Floridan Aquifer Water Quality Data Transmitted 12/20/2004

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Attachment 1
ACEPD Comments 12/20/04
Koppers Portion of the Cabot Carbon/Koppers Superfund Site
Addendum 7: Groundwater Flow and Transport Model Draft Report
Koppers Inc. Site Gainesville, Florida - October 5, 2004
and Preliminary Floridan Aquifer Water Quality Data Transmitted 12/20/04

1. The results of resampling Floridan well FW-06 following redevelopment (removing approximately 1,300 gallons), reported naphthalene concentrations of 1,240 ug/L. Further development and a second resampling produced similar results, with slightly higher concentrations (1,940 and 1,400 ug/l). The elevated concentrations of site contaminants in the Floridan aquifer at this location may indicate that the model is not accurately predicting vertical transport. Remedial actions will be required to address this contamination.
2. ACEPD requests that a second Floridan well be installed downgradient of FW-6 to evaluate Floridan aquifer impacts downgradient. The results from the Floridan aquifer monitoring conducted in November indicate off-site contamination to the north (FW-7).
3. The low permeability "lower clay" at the base of the Hawthorn Group may not be present as a continuous competent unit across the site. Recent drilling activities have shown the lower Hawthorn "clay" unit to be very heterogeneous. Samples from drilling FW-7 showed that much of this lower unit consisted of sands (with varying amounts of silt and clay) and carbonate rocks or non-calcareous mudstone. Lithologic logs from FW-6 also indicate the presence of sands and carbonates in the lower Hawthorn Group.
4. Phenols (2,4-dimethylphenol and 2-methylphenol) and VOCs (benzene) are mobile site contaminants and should be included in any contaminant transport modeling. All three of these compounds were detected in samples obtained from well FW-7 and appear to be moving northward in the Floridan aquifer. Please provide additional model runs for these three site constituents.

ACEPD continues to have concerns about contamination off-site to the west in the vicinity of the Geiersbach property. Monitoring wells installed on NW 31st Street west of NW 6th Street are too far north and west of the former Geiersbach well to adequately address off-site contamination to the west.