



# Alachua County Environmental Protection Department

Chris Bird, Director

December 17, 2008

Mr. Scott Miller  
Remedial Project Manager  
USEPA Region 4  
61 Forsyth Street, SW  
Atlanta, GA 30303

Re: ACEPD Comments on Comprehensive Groundwater Monitoring Sampling and Analysis Plan (CGMSAP), submitted by Beazer East, Dated October 14, 2008

Dear Scott:


The Alachua County Environmental Protection Department (ACEPD) has reviewed the CCMSAP prepared by FTS dated October 14, 2008. ACEPD has reviewed the comments submitted by the Gainesville Regional Utilities DNAPL team to USEPA and generally supports their comments. ACEPD is providing the comments below to reinforce and highlight additional issues of concern.

1. Based on the elevated levels of naphthalene detected in samples from FW-22B Zone-3 (24 ug/L) and Zone-2 (13 ug/L), this well should be monitored at a higher frequency than annually (Table 2-3). ACEPD recommends quarterly monitoring of all zones as this will provide useful data for evaluating potential off-site impacts to residential supply and irrigation wells. Additional multi-zone wells may be needed to the west of the property boundary to monitor the off-site extent of the plume northwest of FW-22B, as it appears that contaminants from the vicinity of FW-12B are migrating northwesterly and impacting FW-22B.
2. Monitoring of Floridan aquifer wells FW-6 and FW-21B should continue quarterly during the "slow rate recovery pumping test" to evaluate water quality changes.
3. Additional wells should be installed and routinely monitored in proximity to FW-12B to evaluate the contamination found in samples from this well. Since the contamination was originally detected in 2005, no additional wells have been constructed in this area to delineate the contamination or evaluate water quality trends in proximity to FW-12B.
4. ACEPD believes that well HG-2D, HG-4S, HG-4D, HG-5D, HG-6S and HG-6D should be monitored semi-annually. There is little historical data for these wells to use in establishing or evaluating trends.
5. There are no lower Hawthorn Group wells in proximity to the South Lagoon or Process Area. To fully evaluate and monitor the contamination in the lower Hawthorn Group, additional wells should be constructed and sampled to monitor groundwater quality in the lower Hawthorn (intermediate aquifer) in the southern portions of the site.

6. To adequately monitor the surficial aquifer east of the Koppers site, additional surficial aquifer monitoring wells will need to be constructed off-site to the east. Naphthalene concentrations in samples obtained in August 2007 from surficial aquifer wells along the property boundary M-16B (5,600 ug/L), M-17 (3,100 ug/L), M-20B (1,300 ug/L), and M-25B (6,500 ug/L) indicate that the extent of offsite contamination to the east has not been defined and cannot be adequately monitored with existing wells.
7. The proposed list of analytes should be expanded to include all reportable constituents in EPA Method 8260 and 8270, not just those constituents listed in Tables 5-3 and 5-4. There may be other constituents, not currently being reported, that would aid in the delineation of the groundwater plumes and contaminant movement and migration. Additionally, the proposed contaminant reporting limits for the CCMSAP should be the lower MDL and Reporting Limits that have been previously used for monitoring of the groundwater at this site and not the higher reporting limits proposed in the plan.
8. Edit and Text clarification -- In Section 1.1.3 of the CGMSAP there is a discussion of 82 monitoring locations in the Floridan program and that there are 75 wells sampled quarterly. These numbers do not appear to be correct and do not reference the monitoring of the multi-zone wells. ACEPD believes the correct wording of this section should state "... a total of 28 monitoring locations are included in the program. Of that total, seven wells are sampled semi-annually, and 21 wells are sampled quarterly. Of the 21 quarterly sampled wells, 19 wells are multi-zone wells that are sampled at 3 or 4 sampling zones per well location."

ACEPD appreciates the opportunity to provide comment on this critical monitoring plan. If you have any questions, please contact me or Robin Hallbourg at 352-264-6800.

Sincerely,



John J. Mousa, Ph.D.

Pollution Prevention Manager

Cc: Rick Hutton, GRU  
John Herbert, JEA  
Kelsey Helton, FDEP  
Robin Hallbourg

