



Alachua County Environmental Protection Department

Chris Bird, Director

January 12, 2010

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

Re: ACEPD Comments on Gradient "Hawthorn Group Sampling Results Carbon/Koppers Superfund Site Gainesville, Florida" dated December 4, 2009

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the Gradient/Weston "Hawthorn Group Sampling Results Carbon/Koppers Superfund Site Gainesville, Florida" prepared on behalf of Cabot Corporation dated December 4, 2009 and has the following comments.

1. ACEPD disagrees with the statements in the report section 2.3 that "suggests that groundwater samples collected from well pair HG-29S/D may have been cross contaminated with groundwater from the surficial aquifer." and the first conclusion in section 5 that "The pine tar related constituents detected in the Hawthorn Group formation, immediately downgradient of the former Cabot lagoons, could be due to cross-contamination, i.e., leakage of surficial aquifer groundwater into the Hawthorn formation, and not truly reflective of groundwater quality in the deeper aquifer unit." There are other scenarios, including downward migration of contaminants from the former lagoons that may have changed the pH of the water in the Hawthorn Group. It should be noted that in addition to low pH, high specific conductance was also observed in samples from HG 29S/D. ACEPD does not believe the workplan as it is presented will provide the additional data needed to begin an assessment of contamination in the intermediate aquifer on the eastern portion of the Cabot/Koppers Superfund Site.
2. In order to evaluate the potential for the surficial aquifer system to have contributed directly via "cross-contamination" or other mechanisms to the contamination observed in wells HG-29S/D. ACEPD requests installation and sampling of a surficial aquifer system well in the HG-29S/D well cluster.
3. In order to better define the contamination in the Hawthorn Group on the Cabot portion of the Cabot/Koppers Superfund Site, ACEPD requests the installation of additional intermediate aquifer (Hawthorn Group) system wells. One additional well cluster, HG-30 S/D, is shown in the Proposed Hawthorn Group Investigation work plan (section 4). A single additional well cluster is not adequate as an initial step to begin assessment of intermediate aquifer system contamination in the Hawthorn Group on the Cabot portion of the site. ACEPD requests one well pair (HG-31S/D) be constructed north of the former lagoons along NE 28th Place (between the former lagoons and proposed well cluster HG-28 S/D) and a second cluster (HG-32S/D) south of the former lagoons to provide shallow and deep intermediate aquifer system wells upgradient of the lagoons

4. ACEPD requests the addition and reporting of all SVOCs (EPA Method 8270) to the proposed sampling constituents in the Proposed Surficial Aquifer Sampling Plan (section 3) and the measurement and reporting of field parameters (pH, specific conductance, temperature, dissolved oxygen and turbidity).


5. ACEPD requests that all the metals and inorganics proposed for the surficial aquifer sampling (section 3) including manganese be added to the parameter coverage for the Hawthorn Group (intermediate aquifer) wells to provide a more complete picture of water quality in the intermediate aquifer. ACEPD also requests the measurement and reporting of field parameters (pH, specific conductance, temperature, dissolved oxygen and turbidity).

6. ACEPD requests that these new and existing intermediate aquifer (Hawthorn Group) including HG-29 cluster and surficial aquifer system wells be sampled on a routine basis as part of compliance monitoring for the former Cabot portion of the site.

7. Given the presence of contamination in the intermediate aquifer, ACEPD requests that USEPA require Cabot to submit a plan for monitoring the Floridan aquifer on the eastern portion of the Cabot/Koppers Superfund Site.

We appreciate the opportunity to comment on this report. If you have any questions about our comments please contact Robin Hallbourg or me at 352-264-6800.

Sincerely,



John J. Mousa, Ph.D.
Pollution Prevention Manager

CC: Wayne Reiber, Cabot Corporation
Manu Sharma, Gradient Corporation
Robin Hallbourg, ACEPD
Kelsey Helton, FDEP

Mark Taylor, Weston Solutions
Stewart Pearson, City of Gainesville
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