

Alachua County Environmental Protection Department

Chris Bird, *Director*

May 5, 2006

Ms. Amy McLaughlin
Remedial Project Manager
US EPA Region IV
61 Forsyth Street
Atlanta, GA 30303-3104

RE: ACEPD Comments on Second Five-year Review Report for Cabot Carbon/Koppers Superfund Site, Gainesville, Alachua County, Florida EPA ID: FLD980709356

Dear Amy:

The Alachua County Environmental Protection Department (ACEPD) generally supports the findings and recommendations and follow-up actions set forth in the Second Five-year Review Report for Cabot Carbon/Koppers Superfund Site. With regards to the timelines and deadlines for the follow-up actions specified in the Second Five-year Review however, ACEPD urges USEPA to expedite the recommended actions so that they may be completed in shorter time frames than specified in the report. Over the past several years, site activities for the most part have been conducted sequentially, with a focus on monitoring the Floridan aquifer. While this monitoring is worthwhile, activities that are directed toward completing a feasibility study, including pilot studies if needed and selecting a site remedy must be conducted concurrently without delay. Our concern is heightened with the recent revelation of much deeper contamination within the Floridan Aquifer on site.

ACEPD has the following comments related to the report recommendations, as well as additional general comments and recommendations related to site activities.

- 1) As part of the assessment of impacts to surface waters, ACEPD requests that current levels of sediment contamination in Springstead Creek be re-evaluated to assess risks to human health and the in-stream aquatic ecosystem. Attached are the results of ACEPD sediment sampling conducted in Hogtown and Springstead Creeks from 1994-2000. ACEPD also requests that sampling plans for surface water include wet season and dry season water quality monitoring as well as sediment sampling in the ditches upstream of Springstead Creek.
- 2) The Hawthorn Group on both the Koppers and Cabot Carbon site has not been fully assessed. Continued monitoring of the intermediate aquifer (Hawthorn Group) wells is necessary to evaluate contaminant movement within the Hawthorn Group and potential impacts to the Floridan aquifer. Limited water quality sampling of selected wells completed in the intermediate aquifer (Hawthorn Group) on the Koppers site was reportedly conducted in 2004 and 2005. ACEPD requests that Beazer sample all existing Hawthorn Group wells that do not contain DNAPL product quarterly and report the results to USEPA.
- 3) There are five wells in the intermediate aquifer (upper Hawthorn Group wells HG-10S, HG-11S, HG-12S, HG-15S and HG-16S) on the Koppers site that are bailed bi-weekly for DNAPL product removal. ACEPD supports continued product recovery and requests that the Beazer previously proposed pilot project to assess the feasibility of product recovery in the Upper Hawthorn be conducted or a reason be given as why this pilot project should not be performed.

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- 4) ACEPD supports the recommendation that the Cabot interceptor trench system west of Main Street be re-evaluated to determine the effectiveness of retaining the contaminants of concern (COC) on-site and stopping off-site migration to the east (of the Cabot site). Additional monitoring wells are necessary to assess potential contamination in the surficial aquifer east of North Main Street.
- 5) ACEPD supports the recommendation that the remaining surficial aquifer wells installed as part of investigations of the Koppers and Cabot sites between 1984 and 1995 be redeveloped and sampled. In addition, ACEPD requests that a revised comprehensive surficial aquifer monitoring plan be developed and implemented for continued quarterly monitoring.
- 6) As set forth in the report, the list of COCs for both the Koppers and Cabot sites must be re-evaluated. In reviewing both the Koppers and Cabot groundwater monitoring data, it has become clear that the full suite of compounds set forth in EPA methods 8260 and 8270 should be reported for all samples analyzed. Organic non-priority pollutant compounds present in groundwater at the site are also needed. ACEPD requests that EPA immediately move forward with actions to re-evaluate the list of COCs for both sites.
- 7) The pathway (natural or artificial) for vertical migration of contaminants in the Floridan aquifer must be identified and remediated. ACEPD reiterates our concerns about the potential presence of an abandoned (unplugged) or improperly plugged well on the Koppers site acting as a conduit for vertical migration of contaminants.
- 8) A remedy that addresses the Floridan aquifer contamination must be selected and implemented.
- 9) ACEPD concurs with Gainesville Regional Utilities that a deadline of July 1, 2007 should be targeted for selection of a site remedy at Koppers.
- 10) The use of monthly conference calls to share information and discuss sites activities for both sites should be re-instituted beginning in May 2006. ACEPD recommends selecting the second Thursday of every month to hold these calls.
- 11) ACEPD believes that not enough information from USEPA about progress on site remediation activities has been provided to the public and local elected officials in Alachua County and the City of Gainesville. Alachua County requests that EPA hold a public meeting in Gainesville to provide an update on the status of both sites to elected officials and the general public and obtain citizen comment. We request that the meeting be scheduled sometime in the fall of 2006 at the latest. We also request that future public meetings be held annually (at a minimum) in Gainesville to keep elected officials and the general public apprised of site related activities.

ACEPD is committed to working with EPA, other stakeholders and the responsible parties to select and implement site remedies that are protective of the environment and our drinking water. Please do not hesitate to contact me or Robin Hallbourg if you have specific questions regarding these comments.

Sincerely,


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

Cc: Chris Bird, EPD
Robin Hallbourg, EPD
J. Erickson, Geo Trans, Inc
K. Helton, FDEP

Gus Olmos, EPD
M. Slenska, Beazer
Brett Goodman, GRU
Rick Hutton, GRU

Attachment : Appendix B

ALACHUA COUNTY EPD HOGTOWN CREEK AND SPRINGSTEAD CREEK SEDIMENT SAMPLING RESULTS SUMMARY, 1994-2000

Volatile Organic Compounds (VOCs)															
Sample Site	Spr-"B"/"C"	Hog-"C"	Spr-"C"	Spr-"C" dipe	Spr-"D"	Hog-"B"	Hog-"C"	Spr-"C"	Spr-"D"	Hog-"B"	Hog-"C"	Spr-"C"	Hog-"B"	Spr-"C"	Hog-Sump
Date	6/29/1994	9/29/1995	9/29/1995	9/29/1995	9/27/1995	9/23/1996	9/23/1996	9/23/1996	9/23/1996	9/24/1999	9/24/1999	9/24/1999	9/28/2000	9/28/2000	9/28/2000
Lab	QAL	PC&B	PC&B	PC&B	PC&B	PPB	PPB	PPB	PPB	PC&B	PC&B	PC&B	PC&B	PC&B	STL
Concentration Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
1,2-Dibromomethane	ND*	134	258	404	334	ND	ND	ND	ND	ND	ND	ND	ND	ND	NR**
Ethylbenzene	19,000	ND	1,070	1,290	1,630	15	134,000	22,600	7,26	15	75,500	ND***	ND***	ND***	ND***
Styrene	8,700	ND	128	436	5,860	30	2,160	4,430	1,43	9	150,000	ND***	ND***	ND***	ND***
Toluene	32,000	106	128	436	5,860	30	2,160	31,300	1,43	9	150,000	ND***	ND***	ND***	ND***
Xylenes	85,000	2,000	7,880	5,500	19,340	1,044	33,500	66,500	16,7	86	219,500	ND***	ND***	ND***	ND***
Semi-Volatiles (Base neutral acid extractables, BNAEs)															
Site	Spr-"B"	Spr-"C"	Hog-"C"	Spr-"C"	Spr-"D"	Hog-"B"	Hog-"C"	Spr-"C"	Spr-"D"	Hog-"B"	Hog-"C"	Spr-"C"	Hog-"B"	Spr-"C"	Hog-Sump #
Date	9/7/1994	8/16/1995	8/27/1995	8/27/1995	8/27/1995	9/23/1996	9/23/1996	9/23/1996	9/23/1996	9/24/1999	9/24/1999	9/24/1999	9/28/2000	9/28/2000	9/28/2000
Lab	QAL	QAL	UFEEES	UFEEES	UFEEES	PPB	PPB	PPB	PPB	PC&B	PC&B	PC&B	PC&B	PC&B	STL
Concentration Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Acenaphthene	19,000	21,000	2,017	461	270,5	ND	13,200	14,850	ND	ND	11,550	ND	ND	ND	ND
Acenaphthylene	31,000	36,000	ND	ND	ND	ND	37,950	59,400	ND	ND	23,100	ND	ND	1,400	ND
Anthracene	18,000	21,000	3,187	1,664,5	1201,5	ND	ND	ND	ND	ND	9,900	ND	ND	600	2,000
Benzo(a) anthracene	11,000	8,900	49	ND	57	ND	ND	ND	ND	ND	ND	ND	ND	540	2,000
Benzo(a) pyrene	ND	ND	71	ND	114	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
Benzo(b) fluoranthene	ND	ND	ND	ND	211,5	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
Bis(2-ethylhexyl) phthalate	12,000	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
Chrysene	ND	ND	490	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
Dibenz(a,h) anthracene	ND	ND	647	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
Di-n-butyl phthalate	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
Dibenzofuran	21,000	22,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA #	2,600
2,4-Dimethylphenol	ND	27,000	ND	ND	ND	ND	ND	24,750	ND	ND	57,750	ND	ND	NA #	2,600
Fluorene	41,000	25,000	1,752	75	1,43	ND	ND	462,000	18,150	ND	ND	ND	ND	6,000	790
Fluoranthene	25,000	14,000	1,285	490	304	ND	ND	16,500	ND	ND	16,500	ND	ND	2,100	2,100
2-Methylnaphthalene	80,000	96,000	ND	ND	ND	ND	42,900	59,400	ND	ND	51,150	ND	ND	NA #	NA #
4-Methylphenol	9,900	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	NA #	NA #
Naphthalene	61,000	77,000	ND	529,5	392	ND	33,000	62,700	ND	ND	39,600	ND	ND	690	690
Phenanthrene	140,000	120,000	1,947,5	1,009	726,5	132,000	64,350	66,000	9,900	46,200	52,800	ND	ND	3,600	3,600
Pyrene	26,000	20,000	1,739	325	257	ND	9,900	9,900	ND	ND	ND	ND	ND	4,600	4,600
Metals (arsenic, chromium, and copper only)															
Site	Spr-"A"	Spr-"B"	Spr-"C"	Spr-"D"	Spr-"E"	Spr-"E" dipe	Hog-"A"	Hog-"B"	Hog-"C"	CD-"A"	Spr-"C"	Spr-"D"	Hog-"B"	Hog-"C"	Hog-Sump
Date	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/19/1995	10/23/1996	10/23/1996	10/23/1996	10/23/1996	9/28/2000
Lab	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	PPB	STL
Concentration Units	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g	ug/g
Arsenic	0.7	1	0.5	0.4	2.8	4.1	0.7	0.5	0.7	0.3	0.638	0.638	0.638	1.76	0.996
Chromium	7.3	6	3.2	1.7	11.8	13.9	5.3	2.9	4.8	1.2	2.8	2.8	2.8	12.9	4.56
Copper	0.7	3.3	26.1	3.7	7.2	9.2	0.8	27.5	19.8	0.8	33.4	33.4	33.4	50.3	26.3

** ND=not detectable
 *** NR=not reported
 # Sample analyzed outside holding time.
 # Sample analyzed only for polynuclear aromatic hydrocarbons (PAHs).
 ## NA=not analyzed