From:	Robin Hallbourg
To:	Miller.Scott@epamail.epa.gov
Cc:	John Mousa
Subject:	ACEPD Comments of the Upper Floridan Aquifer Interim Remedial Measure Work Plan - Koppers
Date:	Wednesday, February 25, 2009 4:06:36 PM

Scott,

I apologize for the delay in sending comments. Our comments are general in nature and GRU DNAPL Team comments covered most issues. The majority of comments below are related to our concerns with the contamination in the lower zones of FW-12B and in FW-22B.

1. ACEPD concurs with comments of GRU's DNAPL team that recommend additional parameters (arsenic and VOCs) be added to the sampling requirements and additional sampling intervals and monitoring wells are needed to monitor effectiveness of the IRM. ACEPD requests that all of the SVOCs in EPA method SW846-8270C be reported, not just selected compounds. Additionally, AECPD recommends including measurement of field parameters for all of the IRM effectiveness monitoring.

2. The IRM workplan implies that it is Beazer's position that the contamination observed in well FW-12B is related to the contamination in Floridan well FW-6. While this may be the case for the contamination observed in the upper most zone (zone 1) in FW-12B, ACEPD does not believe the contamination in the lower zones of monitor well FW-12B can be attributed to migration from FW-6. Samples from both zones 3 and 4 have had extremely high levels of naphthalene since installation of the well. The sample ports for zones 3 and 4 (FW-12B) are at depths of 196 and 216 feet, respectively, which are lower than the total depth of 160 feet reported for well FW-6.

3. While the IRM is important in addressing the contamination in the wells FW-6 and FW-21B, there is no IRM proposed for the lower zones of FW-12B. Addressing the contamination detected in the Floridan aquifer in the lower zones of well FW-12B is essential and an interim remedial measure specific to this contamination is needed. It is extremely important since the contamination in FW-12B is present at depths over 200 feet. There has not been any further assessment, delineation of the vertical or lateral extent or any remediation of this contamination to date. It should be noted that moderate "creosote-like odors" were observed from 217 to 223.5 feet below land surface (BLS) and "faint to strong creosote odors" were reported from 223.5-233 feet BLS during well construction in November 2005 and that initial samples and all subsequent samples from FW-12B showed significant contamination in both lower most zones.

4. No IRM is proposed for well FW-22B along the NW boundary of the site. Samples from well FW-22B, approximately 700 feet northwest of FW-12B near the Koppers western boundary, now show exceedances of the Florida GTCL for naphthalene of 14 ug/L. There is the possibility that this contamination may be related to the contamination at FW-12B. September 2008 data show levels of 17 ug/L and 20 ug/L for zones 2 (monitoring port at a depth of 176.2 feet) and 3 (monitoring port depth 198.2 feet), respectively. Given that there are private drinking water wells in the

neighborhood northwest of the Loppers site, the source of this contamination should be determined and remedial measures enacted to assure that contamination does not migrate off-site.

Thank you.

Robin Hallbourg
Alachua County Environmental Protection Department
352/264-6825