

John Mousa

From: John Mousa
Sent: Monday, June 25, 2012 11:32 AM
To: 'Pearson, Stewart E.'; 'Martin, Jeff'; Robin Hallbourg; 'Helton, Kelsey'; 'Council, Greg'
Cc: 'Hutton, Richard H'; 'Murry, Fredrick J.'
Subject: Need to Install Composite Sampler on Beazer Site Discharge

Jeff,

The recent experience of discharge from the Beazer site due to the Tropical Storm Debbie rainfall that we experienced this week and as reported by Stu Pearson below, strongly indicates that there urgently needs to be a composite sample installed at the Beazer site discharge pipe as soon as possible as required by the FDEP permit. We are likely to experience more of this type of flow in the next few months.

Please call me if you have any questions.

John

John J. Mousa, Ph.D.
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From: Pearson, Stewart E. [<mailto:pearsonse@cityofgainesville.org>]
Sent: Monday, June 25, 2012 10:12 AM
To: 'Martin, Jeff'; John Mousa; Robin Hallbourg; Helton, Kelsey
Cc: Hutton, Richard H; Murry, Fredrick J.
Subject: RE: ACEPD and City of Gainesville Comments on Groundwater Reuse Plan: Beazer Gainesville

There is a minor discharge coming from the Beazer site as of 9:30 AM today. The discharge started sometime after 6:30PM on 6/24. At that time 3 plastic bottles and an aluminum can were placed at the outlet of the pipe connecting to the Beazer property. The flow is evidenced by the disappearance of those markers. The discharge deposited sediment in the outfall ditch. The flow in the pipe was about 4 to 5 inches deep based on the damp mark on the pipe walls and note that the pipe has about 1.5 to 2 inches of sediment in the invert as far as one can see into the pipe.

From: Martin, Jeff [<mailto:Jeff.Martin@dep.state.fl.us>]
Sent: Wednesday, June 20, 2012 4:24 PM
To: Pearson, Stewart E.; 'John Mousa'; 'Robin Hallbourg'; Helton, Kelsey
Cc: Hutton, Richard H; Murry, Fredrick J.
Subject: RE: ACEPD and City of Gainesville Comments on Groundwater Reuse Plan: Beazer Gainesville

Thank you, I will question the consultant about this.
Jeff

From: Pearson, Stewart E. [<mailto:pearsonse@cityofgainesville.org>]
Sent: Wednesday, June 20, 2012 4:14 PM
To: Martin, Jeff; 'John Mousa'; 'Robin Hallbourg'; Helton, Kelsey

Cc: Hutton, Richard H; Murry, Fredrick J.

Subject: RE: ACEPD and City of Gainesville Comments on Groundwater Reuse Plan: Beazer Gainesville

See Item 3 below

From: Martin, Jeff [<mailto:Jeff.Martin@dep.state.fl.us>]

Sent: Monday, June 18, 2012 4:42 PM

To: 'John Mousa'; 'Robin Hallbourg'; Helton, Kelsey

Cc: Pearson, Stewart E.; Hutton, Richard H; Murry, Fredrick J.

Subject: RE: ACEPD and City of Gainesville Comments on Groundwater Reuse Plan: Beazer Gainesville

John,

Here are comments that I received back from Beazer and their consultant. Let me know if any questions.

Thank you,

Jeff

QUESTION 1: Page 5, 3.1, 3rd paragraph - The Plan should include a schedule for implementation of the 10,000 gallon poly storage tank and its ancillary piping and equipment that is set number of days after the approval of the Plan.

RESPONSE 1: Procurement of the necessary equipment is expected to begin immediately upon Plan approval. The Plan is expected to be fully implemented within 3 months of Plan approval.

QUESTION 2: Page 10, 5.0 Sampling and Reporting - The narrative has no mention of reporting. Is it to be assumed that the Water Reuse Plan reporting is to occur quarterly concurrent with the NPDES reporting and include all the documentation noted in the preceding narrative. This needs to be clarified.

RESPONSE 2: The results of groundwater sampling identified in Section 5.0 will be reported semi-annually in accordance with the Comprehensive Groundwater Monitoring and Sample Analysis Plan (CGMSAP Revision 04, FTS, May 4 2012) referenced in the text. Records of carbon-breakthrough sampling discussed in Section 5.0 will be maintained at the Site and used to determine when a carbon unit needs to be replaced.

QUESTION 3: FDEP Permit No. FLS 711462, Progress/Status Report, dated April 26, 2012: The report in section 'Plan for Upcoming Work', bullet 5 notes that a weir and automated composite sampler is planned to be installed. The Permit FLS711462, VI. Schedules, 1. b. notes to "Complete development and implementation of Stormwater Sampling Plan." with a 'Completion Date' of 3 months after issuance. An apparent dichotomy exists between the permit schedule issued in June 2011 and the progress being reported on the installation of the weir and sampler in the April 2012 Report.

RESPONSE 3: The permit-required Stormwater Sampling and Analysis Plan was submitted to FDEP on June 17, 2011. Beazer still intends to install the weir but is reevaluating the need to install an automatic composite sampler. There has not been a discharge of stormwater from the Site since issuance of the permit, and only one discharge (flow-through only) since installation of stormwater controls in October-November 2010.

Comment on Response 3: *The sentence about discharge seems to imply that there is continuous monitoring (24/7) of the flows leaving the site. If so, will the means and methods be disclosed in an effort to assure other concerned parties that supporting detail exists which is being summarized in the statement. If other than 24/7 data exists will the Owner disclose that data so judgments can be made on the completeness/limitations of the observations and the potential for other flows to have occurred without observation.*

Secondly, another hurricane season has begun in Florida. Without the sampler in place the water quality parameters of concern might never be known if the installation is still being 'reevaluated'. In the years between 1998 and 2008 the North Central Florida Region had 2 hurricanes in August w/ 1.3 and 1.5 inches of rain recorded and 4 Hurricanes in September w/ 4.8, 3.6, 3.1 and 3.5 inches of rain recorded. The potential for an extreme rain event at the site escalates each day as months of August and September approach. It seem appropriate to have the sampler in place by August for 2012 hurricane season.

Please let us know if you have any further questions. We hope DEP will approve implementation of the Groundwater Reuse Plan soon.

Thanks,
Greg

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From: Martin, Jeff
Sent: Wednesday, June 06, 2012 12:00 PM
To: 'John Mousa'; Robin Hallbourg
Cc: 'Pearson, Stewart E.'; Hutton, Richard H; Murry, Fredrick J.
Subject: RE: ACEPD and City of Gainesville Comments on Groundwater Reuse Plan: Beazer Gainesville

John,
Just to give you an update, I forwarded these comments to Beazer's on May 25 and still waiting for a response. I appreciate your input on this and once I receive their reply I will let everyone know. Thanks,
Jeff

From: John Mousa [<mailto:jjm@alachuacounty.us>]
Sent: Thursday, May 24, 2012 3:54 PM
To: Martin, Jeff; Robin Hallbourg
Cc: 'Pearson, Stewart E.'; Hutton, Richard H; Murry, Fredrick J.
Subject: ACEPD and City of Gainesville Comments on Groundwater Reuse Plan: Beazer Gainesville

Jeff,

The Alachua County Environmental Protection Department and the City of Gainesville have the following comments on the Groundwater Reuse Plan proposed by Beazer for the former Koppers site.

1. Page 5, 3.1, 3rd paragraph - The Plan should include a schedule for implementation of the 10,000 gallon poly storage tank and its ancillary piping and equipment that is set number of days after the approval of the Plan.
2. Page 10, 5.0 Sampling and Reporting - The narrative has no mention of reporting. Is it to be assumed that the Water Reuse Plan reporting is to occur quarterly concurrent with the NPDES reporting and include all the documentation noted in the preceding narrative. This needs to be clarified.
3. FDEP Permit No. FLS 711462, Progress/Status Report, dated April 26, 2012: The report in section 'Plan for Upcoming Work', bullet 5 notes that a weir and automated composite sampler is planned to be installed. The Permit FLS711462, VI. Schedules, 1. b. notes to "Complete development and implementation of Stormwater Sampling Plan." with a 'Completion Date' of 3 months after issuance. An apparent dichotomy exists between the permit schedule issued in June 2011 and the progress being reported on the installation of the weir and sampler in the April 2012 Report.

Let me know if you have any questions at 352-264-6805.

John

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From: Martin, Jeff [<mailto:Jeff.Martin@dep.state.fl.us>]
Sent: Monday, May 21, 2012 3:34 PM
To: John Mousa; Robin Hallbourg
Cc: 'Pearson, Stewart E.'
Subject: Groundwater Reuse Plan: Beazer Gainesville

To all:

DEP is still reviewing this latest update, but so far this is a favorable looking operation. EPA has reviewed this and has no objection. I was able to stop by the site a few weeks ago and it is of course looking dry and has had no discharge with the lack of rain. Wanted to be sure that everyone has an opportunity to review and I will touch base with everyone by Thursday to see what your thoughts are. Thank you,
Jeff

From: Council, Greg [<mailto:Greg.Council@tetrattech.com>]
Sent: Thursday, May 10, 2012 9:32 AM
To: Martin, Jeff
Cc: 'Mitch.Brouman@TRMI.Biz'
Subject: RE: Groundwater Reuse Plan (Revision 1): Beazer Gainesville

Jeff,

You asked about expected copper, chromium, and iron concentrations in the treated Floridan-Aquifer groundwater proposed for irrigation use at the Beazer Gainesville site.

For the Floridan Aquifer monitoring wells on site, we have collected many samples for chromium and copper analysis. In fact, we have over 1200 results for each constituent (at 84 sampling locations). For both analytes, the maximum detected concentrations are lower than the MCL/SMCL.

For chromium, the highest measured concentration was 0.016 mg/L (MCL = 0.1 mg/L)
For copper, the highest measured concentration was 0.062 mg/L (SMCL = 1 mg/L)

Iron is not a constituent of interest at the Site, and we do not routinely measure iron concentrations in groundwater. In order to answer your question, we sent a sample of the combined water pumped from the Floridan Aquifer (influent to the treatment system) for analysis of iron (total and dissolved). The results were: 0.007 mg/L dissolved and 0.004 mg/L total (see attached; results are estimated because they are below the practical quantitation limit). Therefore, iron in the Floridan Aquifer influent to the carbon treatment is much less than the SCML of 0.3 mg/L.

Therefore, concentrations of copper, iron, and chromium used for irrigation will meet drinking water standards, even without treatment.

If you need more information, please let me know.

Thanks,
Greg

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From: Martin, Jeff [<mailto:Jeff.Martin@dep.state.fl.us>]
Sent: Thursday, March 08, 2012 10:01 AM
To: Council, Greg
Subject: RE: Groundwater Reuse Plan (Revision 1): Beazer Gainesville

Greg,

For the monitoring of the carbon unit, has there been an analysis for copper, iron and total chromium? Can you estimate the discharge final effluent for the irrigation for these metals under the worst case for Table 3.1?

Not sure if any other metals may be present, but the arsenic results look ok.

Thanks,

Jeff

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