

Alachua County Environmental Protection Department

Chris Bird, Director

December 21, 2005

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

RE: ACEPD Comments on Retec 3rd Qtr 2005 Floridan Aquifer Groundwater Monitoring Report, Cabot-Koppers Superfund Site


Dear Amy,

The Alachua County Environmental Protection Department has reviewed the Retec 3rd Qtr 2005 Floridan Aquifer Groundwater Monitoring Report, Cabot-Koppers Superfund Site dated November 21, 2005 and has the following comments:

- 1) ACEPD is concerned about the reliability and accuracy of the reported concentrations for phenol, 2,4 dimethylphenol and 3 and 4- methylphenol and pentachlorophenol in the samples from FW3 and FW3-DUP due to the very low recoveries reported for the acid surrogates phenolics of less than 10% recovery. The sample concentrations for phenolics are reported as "estimated", however, with surrogate recoveries as low as 10% the actual concentrations in the samples may be as much as 10 times higher than what is being reported. Therefore the conclusions stated on Page 3 of the Retec report that " For well FW-3, none of the organic constituents exceeded GCTLs or MCLs" may not be an accurate conclusion. There appears to be a continuing problem with obtaining good quality control with the phenolic analysis from this site, as ACEPD has commented on similar problems observed in earlier RETEC monitoring data from these Floridan wells.
- 2) The RETEC report also states that in sample FW-6 the matrix spike recovery was outside of control limits for naphthalene and that the reported naphthalene concentration in the sample is "estimated". The low 44% matrix recovery indicates that the reported 840 ug/L concentration of naphthalene is probably biased low. The actual concentration could be as much 40 to 50% higher based on this recovery. Therefore, ACEPD believes it is not accurate based on this data for RETEC to state in the report that the 3rd Qtr results are lower than the 2nd Qtr results and that a continuing downward trend in naphthalene concentration in FW-6 is being observed. Additional data with consistent and improved QA/QC would be needed to better evaluate any trends in the data.

Please call me at 352-264-6805 if you have any questions on concerns about these comments.

Sincerely,


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

Cc: K. Helton, FDEP
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