



# ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT

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December 17, 2003

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Mr. Maher Budeir, Project Manager  
US Environmental Protection Agency—Region 4  
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61 Forsyth Street, SW  
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Re: ACEPD Comments on Third and Fourth Addendums to Hawthorn Group  
Characterization Work Plan --Cabot Carbon/Koppers Superfund Site,  
November 2003

Dear Maher:

Attached to this letter are technical comments from the Alachua County  
Environmental Protection Department (ACEPD) on the above referenced work  
plans prepared by TRC for Beazer East, Inc. These comments address  
specific adjustments to the proposed scope of work that ACEPD believes  
would improve the usefulness of the data to be gathered and also address  
specific QA/QC issues dealing with the sampling and analytical protocols.

If you, Beazer or TRC have any questions about these comments please feel  
free to call Robin Hallbourg, P.G. at 352-264-6825 or alternatively me at 352-  
264-6805.

Sincerely,

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

CC: Robin Hallbourg  
Chris Bird  
Paul Myers, Alachua County Health Department  
Kelsey Helton, Florida Department of Environmental Protection  
Mike Slenska, Beazer East, Inc. (e-mail)  
Brett Goodman, Gainesville Regional Utilities ( )  
File 1658 Green Vol 12

ATTACHMENT I: ACEPD Comments on Third and Fourth Addendum-  
November 2003



**ATTACHMENT I**

**ACEPD Comments on Third and Fourth Addendums to Hawthorn Group Characterization Workplans—November 2003 Cabot-Koppers Superfund Site**

**Third Addendum - Workplan for Additional Investigation of the Hawthorn Group Formation Sampling of Private Wells**

1. In order to comprehensively evaluate groundwater surrounding the site, additional wells located close to the site should be sampled and logged. ACEPD recommends sampling all wells east of NW 6th Street and south of NW 33<sup>rd</sup> Avenue, and all wells located between the railroad tracks and north Main Street. There are potentially 14 additional wells between these two areas.
2. All private wells evaluated as part of this program that are found to interconnect aquifers (due to casing deterioration or poor construction) and all unused wells should be properly plugged and abandoned by Beazer East, Inc. Well abandonment activities should be coordinated with the SJRWMD and follow their protocols.
3. Copper, chromium, and iron (total and dissolved) should be added to the suite of constituents analyzed as part of this investigation. Copper and chromium are both potential site-specific contaminants. Iron should be included as a constituent, since most if not all of the wells have galvanized iron pipe or black iron pipe for casing.
4. Where possible, ACEPD recommends using existing in-place submersible pumps and sampling the private wells which have operational pumps prior to pulling the pump and piping and logging the wells. This reduces the chances of sampling error and potential for cross-contamination.
5. More than three well volumes may be required to adequately purge a well prior to sample collection. Removal of the existing pumps and piping, well logging, and setting the purge pump may cause increased particulates (suspended solids) and iron in the well water. Most of the wells are constructed of galvanized iron pipe or black iron pipe, and have a galvanized iron piping to the home. Turbidity should be closely monitored during well purging.
6. Pump removal, logging, and sampling activities not only contribute to excessive suspended solids, but may introduce bacteria into the water system. ACEPD recommends that all potable wells and associated piping are sanitized or disinfected after sampling is completed.
7. ACEPD does not recommend the use of a bailer to sample the wells, due to the possibility of dislodging corroded materials from the inside of the casing. ACEPD recommends the use of a submersible pump or a bladder pump to sample the wells. If a bailer is used, it should be a closed top design that is constructed of Teflon, not polyethylene.
8. Samples for volatile organic compounds (VOCs) that are not preserved with HCl have a shorter holding time (7 days).
9. Equipment rinse blanks for all constituents shall be collected from the bailers proposed for sample collection, if bailers are used for sample collection.

**Fourth Addendum - Workplan for Additional Investigation of the Hawthorn Group Formation Abandonment of Monitoring Wells**

1. ACEPD concurs with abandonment of wells ITW-10, ITW-13, and ITW-21.
2. Copper and chromium (total and dissolved) should be added to the suite of constituents analyzed as part of the well sampling. Copper and chromium are both potential site-specific contaminants.

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3. A bladder pump should be used for purging and sample collection, as was done during the November 2003 sampling program. If a bailer is used for sample collection, the material should be Teflon, not polyethylene.
4. An ACEPD well registration form must be completed prior to well abandonment. Upon completion of the abandonment, a copy of the well driller's completion report describing the well abandonment procedures shall be submitted to ACEPD.