



Alachua County Environmental Protection Department

Chris Bird, Director

April 28, 2006

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

RE: ACEPD Comments on 1) Retec 2005 Fourth Quarter Floridan Aquifer Groundwater Monitoring Report, transmitted March 3, 2006 and 2) GeoTrans Water Quality Sampling Results for Transect and Source Area Wells, transmitted April 3, 2006 at the Koppers Superfund Site and 3) Floridan Monitoring Well FW-24C Design transmitted April 6, 2006

Dear Amy:

ACEPD has the following comments about the above referenced reports, as well as general comments about additional monitoring:

Retec 2005 Fourth Quarter Floridan Aquifer Groundwater Monitoring Report, transmitted March 3, 2006

- 1) The final field turbidity for MWTP-MW-1 when sampled on 12/13/05 was reported to be 89 NTU. Turbidity ranged from 471 to 89 NTU during purging. The well was reportedly purged for one hour and four minutes, for a total volume of 1.6 gallons removed. This well should be re-developed prior to the next quarter of sampling. If MWTP-MW-2 has not been adequately developed, it should also be redeveloped. Field turbidity must be below 10 NTU prior to sample collection.
- 2) The holding times for unpreserved VOC samples (Method SW-846 Method 8260B) were exceeded for samples FW-8, ERB-01, MWTP-MW-1, FW-9, FW-2 and FW-2Dup01, and the data were qualified. Data from samples that exceed holding times does not provide the quality of data needed for this project. Sample preservation with HCl increases the holding time from seven to 14 days. If unpreserved samples cannot be analyzed within the applicable seven-day holding time, then the samples should be field preserved to extend the holding times.
- 3) Bromide should be added to the list of monitoring constituents for all Floridan wells since it was used as a conservative tracer during well installation. Although it was removed by over pumping at the completion of well installation, bromide concentrations may provide qualitative information on groundwater flow and contaminant transport.

GeoTrans Water Quality Sampling Results for Transect and Source Area Wells, transmitted April 3, 2006

- 4) No field measurement data for pH, specific conductance, temperature, dissolved oxygen (DO), turbidity, oxidation reduction potential (ORP), or water level were submitted with data from either sampling of the transect or source area wells (data submitted February 10 and April 3, 2006). ACEPD understands that field data were collected during purging with the Waterra pump and some of the field data may not be representative. ACEPD requests that these data be submitted in the final report. Additionally, ACEPD requests that field measurements be collected from bailed

201 SE 2nd Avenue Suite 201 ■ Gainesville, Florida 32601 ■ Tel. (352) 264-6800 ■ Fax (352) 264-6852

Suncom 651-6800 ■ TDD (352) 491-4430

Home Page: www.environment.alachua.fl.us

An Equal Opportunity Employer M.F.V.D.



April 28, 2006

Letter to Ms. Amy McLaughlin, Remedial Project Manager

RE: Groundwater Monitoring Activities at the Koppers, Inc., Gainesville, FL

Page 2

samples when samples for laboratory analyses are collected for all future monitoring. Field instrument calibration logs and field notes should also be included in the final report. These data are essential to the evaluation of the results of field and laboratory analyses. The water level, discharge rate, drawdown and bromide concentration data obtained during bromide reduction/well development report must also be provided.

- 5) Field QC samples such as field duplicates, field blanks, filter blanks, equipment rinsate blanks, trip blanks and Matrix Spike and Matrix Spike duplicate (MS/MSD) samples must be identified in all laboratory data submitted.
- 6) A current, comprehensive Floridan aquifer groundwater surface elevation map is needed. This was conceptually discussed during the April 18, 2006 conference call. During the next quarterly Floridan aquifer monitoring well sampling (quarter two 2006), ACEPD requests collection of water level (or pressure data corrected to water level) from all Floridan aquifer monitor wells. For the multi-zone wells, water level data should be obtained from the upper zone (interval #1). The data should be collected over as short of a time interval as possible to minimize variability. Two independent rounds of water level data should be collected for verification. To provide additional data points, ACEPD requests that both off-site monitoring wells installed by GRU, MWTP-MW-1 and MWTP-MW-2 be surveyed to the same datum as the on-site wells (if this has not been done) and included in the next round of water level measurements. If not already conducted, the measuring point elevation for FW-5 must be resurveyed and the measuring point elevations must be established for all of the multi-zone wells.

The presence of the highest concentrations of contaminants in interval #4 of FW-12B is of concern. The absence of contamination in interval #1 and increasing concentrations with depth suggests the presence of a vertical conduit transmitting contaminated water to a more transmissive zone between 225 and 235' bls. The high concentration of naphthalene and the absence or relatively low concentrations of phenols (typically more mobile and potentially indicative of the leading edge of a plume) indicate that the source of these contaminants are in proximity to this well and FW-6, which also shows this pattern. Vertical conduits can be natural or artificial. The potential presence of an abandoned (unplugged) or improperly plugged well on the Koppers site should be evaluated. ACEPD has received anecdotal information that a well, formerly used for fire suppression, existed on the northern portion of the Koppers property. Penny Salisbury, Koppers Plant Manager reported to ACEPD that there might have been other wells on the property. Two sites she mentioned were (1) the area of the current office that was formerly the location of a residence for an earlier plant manager, and (2) a trailer formerly located where the "blue" building is near the north lagoon. ACEPD requests that Beazer thoroughly investigate the site for the presence of unidentified wells that may serve as conduits for vertical migration of contaminants.

Floridan Monitoring Well FW-24C Design transmitted April 6, 2006

- 7) The consensus of the stakeholders, in discussions held on April 18, 2006, was to hold off construction of proposed well FW-24-C until a comprehensive report detailing the Floridan aquifer transect and source area monitoring could be prepared and reviewed. While ACEPD understands those concerns, it is imperative to assess the vertical extent of contamination without delay. ACEPD requests that EPA require Beazer to develop and submit a plan, which includes additional monitoring wells, to assess the vertical extent of contamination in the vicinity of FW-12B.
- 8) ACEPD conceptually agrees with the construction details proposed in the well design transmitted April 6, 2006.

April 28, 2006

Letter to Ms. Amy McLaughlin, Remedial Project Manager

RE: Groundwater Monitoring Activities at the Koppers, Inc., Gainesville, FL

Page 3

- 9) ACEPD concurs with EPA and others on the need for aquifer testing to determine the hydraulic characteristics of the reported "semiconfining" unit and agrees that any extensive aquifer testing should be conducted away from areas of contamination. ACEPD requests that EPA require Beazer to move forward in developing a plan and submit it for review with the June 2006 report.

Please do not hesitate to contact Robin Hallbourg if you have specific questions regarding these comments.

Sincerely,



John J. Mousa, Ph.D.

Pollution Prevention Manager



Robin Hallbourg, P.G.

Professional Geologist

Cc: Chris Bird, EPD
J. Erickson, Geo Trans, Inc. (e-mail)
Brett Goodman, GRU
K. Helton, FDEP
Gus Olmos, EPD
M. Slenska, Beazer