



# Alachua County Environmental Protection Department

Chris Bird, Director

April 9, 2008

Mr. Scott Miller  
Remedial Project Manager  
Waste Management Division  
USEPA Region 4  
61 Forsyth Street SW  
Atlanta, GA 30303

Re: ACEPD Response to Beazer-EPA Potential Onsite Remedial Alternatives and Meeting  
Minutes Dated March 10, 2008 Cabot-Koppers Superfund Site

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the Beazer-EPA Collaborative Team Potential Onsite Remedial Alternatives as contained in Attachment C of the Meeting Minutes dated March 10, 2008. ACEPD's comments are included as Attachment 1 to this letter.

ACEPD appreciates your consideration of our comments and concerns. If you have any questions about these comments please contact me at 352-263-6805 or via e-mail at [jjm@alachuacounty.us](mailto:jjm@alachuacounty.us)

Sincerely,

John Mousa, Ph.D.  
Pollution Prevention Manager

Attachment 1: ACEPD Comments on Beazer EPA Collaborative Team Potential Remedial Alternatives

CC: Rick Hutton, GRU  
Mitchell Brouman (Beazer)  
John Herbert, JEA  
Robin Hallbourg (e-mail)  
Kelsey Helton (FDEP)  
File J. Mousa



## Attachment 1

ACEPD Comments on Beazer-EPA Collaborative Team Potential Onsite Remedial Alternatives

1) ACEPD believes that source removal or reduction should remain an important goal of any remedial plan developed for the Koppers Superfund Site. ACEPD does not agree with the decision made by the USEPA-Beazer Collaborative team to screen out any source excavation alternatives as exemplified by Alternative 6 in the proposed remedial alternatives. ACEPD requests that a source removal alternative be included in the alternatives to be further evaluated. ACEPD is not aware that USEPA had approved or adopted the conclusions of the TRC Source removal report of January 2005 which concludes that source removal is unfeasible. In our letter to USEPA of February 22, 2005, ACEPD expressed strong reservations about the conclusions of the January 2005 TRC report. ACEPD understands that excavation to the top of the middle Hawthorn clay as described in Alternative 6 may be impractical. However a more limited source removal alternative such as excavation of source material from the surficial aquifer only to the top of the upper Hawthorn clay layer has some advantages and should be fully evaluated. Source excavation from the surficial aquifer does not have to involve offsite transportation and disposal of contaminated media as there may be alternatives for on-site treatment and reuse of soil that may be feasible. Removal of source material from the surficial aquifer combined with in-situ treatment or isolation of the source material in the Upper Hawthorn and groundwater treatment or containment of the Floridan impacts should be evaluated as a feasible remedial alternative. Advantages to removal of source material from the surficial aquifer include:

- a) Removing the source of surficial ground water contamination from the primary source areas could reduce the need for the continuous operation of a boundary extraction and containment systems and could significantly reduce the operation time;
- b) Removing source material from the surficial aquifer will reduce surficial groundwater contamination and reduce the potential for downward migration of contaminated groundwater into the lower aquifers and reduce the threat to the Murphree wellfield;
- c) Removal of source material from the surficial aquifer may reduce the need for surface engineering controls and allow more unrestricted use of the site in the future.

2. Significant groundwater contamination exists within the Hawthorn Group (intermediate) aquifers outside the foot print of the source areas. Alternative #1 as proposed does not provide for groundwater recovery or treatment or source stabilization/reduction techniques, such as ISBS or ChemOx to reduce the DNAPL or treat contaminated groundwater in these areas. In Alternatives #2 and #3 a contingency extraction system is proposed for the Upper and Lower Hawthorn Group formations only if the contaminant plume within these formations expands. Alternative #4 includes ISBS and monitoring plume stability in the upper Hawthorn Group and monitoring stability with contingency groundwater extraction as an option in the Lower Hawthorn Group. All four of these alternatives do not adequately provide groundwater treatment and/or recovery in areas where the contaminants have migrated laterally away from the source areas. Examples of this are the contamination observed in wells HG-4S and HG-4I, where naphthalene was present at 3,700 ug/L and 2,600 ug/L, respectively and well HG-26S to the east where naphthalene was present at 1,300 ug/L. The groundwater target clean-up level (GTCL) for naphthalene of 14 ug/L is two orders of magnitude lower than current levels in the groundwater. Levels of naphthalene for samples from two wells in the lower Hawthorn were also orders of magnitude about the GTCL, with concentrations in samples from HG-6D and HG-4D of 3,850 ug/L and 1,300 ug/L, respectively.

3. Active remediation for the Floridan aquifer is essential in protecting the Murphree Wellfield and private drinking water wells in the vicinity of the site. Alternatives #1 through 4 only provide for a contingency extraction system for hydraulic containment in the Floridan aquifer should the plume expand based on monitoring data. The Floridan aquifer at the Murphree Wellfield is the source of drinking water for the entire Gainesville urban area; pumpage rates are on the order of 26 million gallons per day (gpd). This potential remedy for Floridan aquifer contamination is not acceptable.

4. None of the proposed alternatives for remediation of surface soils and surficial water in the report directly addresses how storm water runoff will be addressed or coordinated in the evaluation of alternatives. A comprehensive storm water management system should be developed for the Koppers site as part of any remedial alternative selected. Currently, the site has no storm water treatment and because of concerns about contamination and the awaited remediation, earlier proposed plans for storm water treatment were placed on hold. The ditch that traverses the site carries untreated storm water from the Koppers site, as well as NW 23<sup>rd</sup> Avenue, directly to Springstead Creek.

5. Some of the remedial technologies proposed for a particular zone or matrix such as ISBS, ISS, biobarriers, etc. appear to have been proposed for only selected alternatives presented in the report. It is not clear why a particular remedial technology was selected to go with a particular alternative and not with others without further explanation or documentation. It may be that certain technologies could be made part of different alternatives than the ones that were selected by the Beazer-USEPA Collaborative Team. ACEPD believes that there needs to be some flexibility in the evaluation of alternatives to consider applying technologies or remedies that may not have been assigned to a particular alternative.

6. ACEPD continues to have concern with the proposal to use Industrial clean-up standards for on-site surficial soils. ACEPD understands the USEPA is not required to specify more stringent standards than those corresponding to the current industrial land use. It is also understood that there may be engineering controls and deed restrictions on the site if certain remedies are selected. However, ACEPD believes that more stringent residential standards for surface soils are more appropriate for this site considering the proximity of the Koppers site to residential neighborhoods including current ongoing neighborhood concerns about dust emissions from the site.