

July 7, 2009

Mr. Scott Miller
Remedial Project Manager
United States Environmental Protection Agency
Region IV, Superfund North Florida Section
61 Forsyth Street, SW
Atlanta, GA 30303

RE: Notes from July 1, 2009 Conference Call Regarding Floridan IRM at the Koppers
Portion of the Cabot/Koppers Superfund Site

Dear Scott:

Thank you for the July 1, 2009 conference call regarding the Floridan Aquifer IRM at the Koppers Gainesville site. It was very helpful to us to understand EPA's current thinking as well as FDEP, ACEPD and Beazer's current thinking regarding the Floridan Aquifer. Attached is a summary of our notes on the major points from that conference call. Please clarify if any of the information is inaccurate, or if I have left off any major points.

As a follow-up to the call, below are our thoughts on the issues discussed:

1. GRU supports the two-pronged approach of implementing active remediation in the Floridan, while at the same time implementing a robust groundwater monitoring program with well-defined triggers for additional action;
2. While we support the use of adaptive management to make adjustments to the remedial approach, it is critical to us that Floridan remedies being implemented as part of the ROD have a reasonable expectation of containing and cleaning up the Floridan contamination;
3. GRU supports Beazer moving forward with the Floridan IRM, per the most recent workplan. One item not included in the current workplan that we would like is the inclusion of VOC's on the parameter list. The data should be rigorously evaluated to determine the effectiveness of the IRM.
4. Although we feel a tracer study would add information that could assist in the site understanding, we also understand that data could be the subject of much debate. As such, we are in agreement with moving forward with the Floridan IRM without a tracer study at this time;
5. GRU supports plugging and abandoning wells that Beazer feels are sources of borehole leakage between the Lower Hawthorn and the Upper Floridan as long as the abandoned wells are replaced with appropriately placed multi-port wells (wells

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that will function like the Westbay wells). The replacement wells should be strategically located to support the groundwater monitoring/contingency plan;

6. We strongly believe that borehole leakage is not a significant cause of contamination in the Floridan aquifer. We support the Floridan IRM and/or abandonment of suspect Floridan wells. However, we feel these steps are interim measures that will not be reasonably expected to fully control contamination in the Floridan, and that additional active remedies will be required in the Floridan.
7. Based on the available data, GRU supports focused containment of the Floridan (i.e. in localized areas of the site) with conservative contingency triggers. We believe the data indicates offsite migration in the Floridan at this time.
8. GRU supports construction of additional interior wells downgradient of FW-12B and at other locations as part of the long-term monitoring and contingency triggers.
9. GRU supports the concept of establishing conservative contingency triggers for interior wells in addition to perimeter wells. If interior wells indicate failure to achieve improvement in a reasonable timeframe or further spreading of the plume, additional actions should be taken rather than waiting until concentration criteria (MCLs, GCTLs, or other criteria where MCLs or GCTLs have not been established – phenols for example) are reached at the property boundary.

Thank you for your on-going effort in addressing the Cabot/Koppers Superfund site. If you need additional information, please contact me at 352-393-1218.

Sincerely,



Rick Hutton, P.E.
Supervising Utility Engineer

xc: John Mousa (ACEPD)
Kelsey Helton (FDEP)
Mitchell Brouman (Beazer East, Inc.)
John Herbert (Jones Edmunds)
David Richardson, Ron Herget (GRU)
Correspondence