GRU Comments to
Upper Floridan Aquifer Extraction Well FW-31BE
Performance Monitoring Workplan (April 28, 2010);
Koppers Inc. Site, Gainesville, Florida

GRU offers the following comments to the workplan:

1. In addition to the recording of water levels proposed by GeoTrans, we believe that water level should be recorded (during the 1-week constant rate test only) in wells FW-24B and FW-2.
2. Section 2.3 suggests that water levels will be recorded only once every 12 hrs. We suggest much more frequent data recording throughout the test (once every 15 minutes). GeoTrans has reported water level changes in the Floridan over the course of a single sampling day (quarterly sampling reports). And that is in the absence of any nearby pumping.
3. Section 2.3: GeoTrans should clearly specify much more frequent data collection at the start and finish of the test. The work plan alludes to collecting data on five second intervals if the pump fails – we assume that would apply at the start and cessation of pumping but it should be clearly stated.
4. Regarding detection/reporting limits – we believe the low detection limits historically achieved at the Koppers Site are necessary. See comments to the CGMSAP by GRU, FDEP, ACEPD, and USEPA relative to detection and reporting limits. We believe the historically low detection/reporting limits should be met by all analyses conducted at the Cabot Carbon – Koppers Superfund Site. Specifically - The tables in the “Upper Floridan Aquifer Extraction Well FW-31BE Performance Monitoring Workplan; Koppers Inc. Site, Gainesville, Florida” suggest that concentrations below the MRL but above the MDL will be reported as "J" values only if they are at, or exceed the GCTL. This is not acceptable because no "J" values would be ever reported except for 3-&4-methyl phenol and carbazole who’s MRL are less than the GCTL. Most critically on the northwest corner of the site where acenaphthene is a key indicator of off-site migration pathways for Koppers contaminants, no values below the MRL of 5 µg/L would ever be reported because they would not exceed the GCTL.