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Subject: Comments on the Beazer Institutional Control Work plan
Date: Thursday, October 10, 2013 2:58:47 PM

Dear Mr. Kestle,

GRU's comments to the Beazer Institutional Control Implementation and Assurance Plan for the Cabot Koppers site dated August 23, 2013.

Section 3 Neither the introductory paragraph (Section 3) nor the discussion of Groundwater Use Restriction (Section 3.1) acknowledge the requirement in the ROD that groundwater outside the containment area be remediated to Florida GCTLs. GRU understands that attaining GCTLs in groundwater outside the containment area will take a very long time that temporary restrictions to groundwater use may be required; however, that is not clearly stated in Sections 3 or 3.1.

The second paragraph of Section 3.3.1 states "For groundwater, the presently envisioned containment remedy will ultimately result in meeting cleanup goals at all off-Property areas ... without need for off-Property engineering controls or permanent institutional controls." Beazer might consider moving that text and a discussion of ROD requirements to the introduction of Section 3- so the reader will have that information when reading the reading the discussion of groundwater use restrictions.

Section 3.1, second paragraph

The document states "There have been no off-Property exceedances of groundwater cleanup goals measured in the deeper Upper Floridan Aquifer which is the drinking-water source for the local area" with the word "deeper" making a comparison to the shallower Hawthorn. This statement is misleading because it has been confidently inferred from available data that offsite impacts to the Floridan Aquifer above GCTLs have occurred at the NW corner of the site and at the Former Drip Track. Beazer installed Floridan extraction wells to address those issues.

Section 3.1, second paragraph

The document states "Certain exceedances of groundwater cleanup goals east of the Property are attributable to past releases from the former Cabot facility rather than past releases from the former Koppers facility". While the statement is correct it could be easily misinterpreted. GRU believes a more accurate statement is "Exceedances of groundwater cleanup goals east of the Property are attributable to past releases from the former Cabot facility and past releases from the former Koppers facility".

Section 3.1, last paragraph

The document states that “Groundwater shall not be used, other than for withdrawal of groundwater for remediation and sampling. The use of groundwater for potable use is prohibited”. GRU suggests replacing the second sentence with the “Extraction of groundwater for any other use is prohibited”.

Section 3.2, last paragraph

It is unclear whether the prohibited land uses described apply only to off-Property parcels with proprietary controls, or whether they also apply to the Property. Several of the prohibited land uses are considered desirable by the community for reuse of the Koppers property.

Thank You

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