From:	Hutton, Richard H
To:	Brett P. Goodman; chaffins.Randall@epa.gov; Chris Bird; Greg Council; Helton, Kelsey; Jim Erickson; John Mousa; John Herbert; kevin koporec; Miller.Scott@epamail.epa.gov; mitch.brourman@hanson.biz; Osteen.Bill@epamail.epa.gov; Richard E. Jackson; Robin Hallbourg; RWCLEARY@aol.com; Stanley Feenstra; wayne_reiber@cabot-corp.com
Subject:	GRU Comments on Upper Floridan Aquifer Well Installation Workplan dated November 4, 2009
Date:	Monday, November 16, 2009 10:51:29 AM

Scott,

Below are GRU's comments on the *Upper Floridan Aquifer Well Installation Workplan: Investigation of Northwestern Area of Koppers, Inc. Site, Gainesville, Florida* dated November 4, 2009

1. GeoTrans proposes Westbay completions for onsite wells FW-28B and FW-30B but not for FW-27B. As of this date all onsite multiscreened wells have been completed with Westbay sampling hardware and FW-27B should also be a Westbay completion; otherwise, it will not be possible to identify impacts to discrete intervals – the semiconfining unit for example. GeoTrans does not propose Westbay completions for sentinel wells FW-29B or FW-29C – this is consistent with the other two sentinel well clusters; however, we continue to believe that all multiscreened wells should be completed using Westbay or equivalent sampling hardware.
2. GRU and FDEP requested one or more Floridan Westbay wells downgradient of FW-16B at the Drip Track source area. GRU maintains that those wells are necessary and we look forward to seeing them installed in the near future.
3. A larger well diameter, even just upsizing to 6-inch dia., would allow pumping at higher rates if there is a possibility that this would be desirable in the future. We understand this may require more expense and potentially a CUP for the extraction well, but a higher pumping rate may be necessary to see a response in observation wells. Recording a response from the constant rate test in the observation wells FW-22B and FW-22C might allow better calculation of aquifer parameters.
4. Background monitoring of groundwater levels in the pumping and observation wells prior to testing should be conducted for a duration of at least 24 to 48 hours. At some sites we collect 5 days of background (static) water level data in the pumping and observation wells. If influences on static groundwater levels at this site are well understood then it would be acceptable to shorten the duration of background monitoring for just the step-drawdown test.
5. There should be better definition of the pumping water level stability (i.e. pumping "until drawdown is asymptotic"). On water supply APT specs and plans we use the statement, "…or until achieving stability as defined by a change in water level that is not more than 0.1 feet in 1 hour." Same comment for recovery of water levels.
6. GeoTrans should collect water quality samples at the beginning and end of the hydraulic testing. Samples should be analyzed for those compounds reported for the quarterly sampling events.

Thank You Very Much

Rick Hutton, P.E.
Supervising Utility Engineer
Strategic Planning
Gainesville Regional Utilities
(352) 393-1218