

April 20, 2006

Ms. Amy McLaughlin
Remedial Project Manager
US Environmental Protection Agency – Region 4
Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

RECEIVED
ALACHUA COUNTY
ENVIRONMENTAL
APR 24 2006
PROTECTION
DEPARTMENT

RE: USEPA 5-year Review Report
Cabot Carbon/Koppers Superfund Site, Gainesville Florida

Dear Ms. McLaughlin:

The following is in response to the *Second Five-Year Review Report for the Cabot Carbon/Koppers Superfund Site* (5-year review) issued on April 4, 2006, and the activities associated with the Floridan Monitoring Plan. GRU agrees with the issues, recommendations, and required follow-up action presented in the 5-year review. Given that the remedy at the Koppers Site is not protective of human health and that a protective determination of the remedy at the Cabot Carbon portion of the site cannot be made until additional information is obtained, we request the follow-up actions be completed in accordance with the milestone dates presented in Table 13 of the 5-year review. In addition, the persistence of groundwater contamination in the Floridan aquifer at over 100 times the clean up standard demonstrates that immediate actions are necessary to implement remedial measures in the Floridan aquifer. We request that the following tasks be completed concurrently with the follow-up actions from the 5-year review:

- Log wells FW-22B and FW-23B with a high precision electro-magnetic flow meter prior to the installation of the Westbay monitoring system. This will measure the magnitude of vertical gradients that may exist within the Upper Floridan aquifer between monitoring zones.
- Direct Beazer to issue a report for the work conducted as part of the Floridan Monitoring Plan to be submitted to EPA and stakeholders by June 1, 2006. The report should include all analytical and head measurements taken during the development and sampling for all monitoring zones including the flow logs for wells FW-22B and FW-23B.
- Halt the installation of any deeper Floridan well including FW-24C until the interim report on the Floridan Monitoring Plan is submitted and reviewed by stakeholders. Based on the findings in FW-12B and the vertical gradient information, additional transect wells in the deeper Floridan may be needed.
- Conduct aquifer pumping tests in the Floridan aquifer to determine the aquifer characteristics including anisotropy to support the evaluation of contaminant fate and transport and design of a remedial action employing hydraulic containment.¹

¹ Recommendation from GRU Review and Recommendations Report for the Cabot Carbon/Koppers Superfund Site, February 2006.

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- Evaluate the migration pathways and attenuation mechanisms in the Floridan aquifer between the Koppers Site and the Murphree Wellfield.¹
- Complete a series of high-resolution geophysical profiles across the site in order to better characterize the stratigraphy of the Superfund Site including the Floridan aquifer. The survey should establish the horizontal and vertical bounds of the unconsolidated Ocala Limestone.¹
- Evaluate and select a remedy for the Floridan aquifer.

Given the potential impacts of this site to the Murphree Wellfield, we request that the remedial measures in Floridan aquifer be given the highest priority so that a remedy can be selected and initiated by July 1, 2007. We appreciate the efforts of the USEPA and the United States Army Corps of Engineers in completing the 5-year review. If you need additional information, please contact me at 352-393-1613.

Sincerely,



Brett Goodman, P.E.

Supervising Utility Engineer

xc: Mike Slenska (Beazer)
Jim Erickson (Geotrans)
John Mousa (ACEPD)
Kelsey Helton (FDEP)
Paul Myers (ACDH)
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GRU Team