

August 13, 2008

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: GRU Comments to Joint Feasibility Study Scoping Meeting Minutes July 24, 2008

Dear Mr. Miller:

This letter presents GRU's comments to the Joint Feasibility Study Scoping Meeting Minutes dated July 24, 2008. General comments are presented below. In addition, comments to specific sections of the document are attached.

1. **For all alternatives there are “No new monitoring wells required” in the Floridan Aquifer.** The extent of the Floridan contamination in the vicinities of FW-6, FW-20B, FW-21B and FW-12B has not been fully delineated. Beazer has postulated that the contamination at FW-6, FW-20B and FW-21B is limited and is due to drag-down. However, this has yet to be demonstrated. The proposed pumping tests may or may not be able to demonstrate this. The contamination at FW-12B is of even greater concern since the contamination increases with depth, and cannot be explained by drag-down. Beazer has proposed additional wells in the vicinity of FW-12B to further investigate this. When will these wells be installed? In addition, we have also requested additional Floridan monitoring wells along the northern perimeter of the site. We do not agree that no new monitoring wells are required in the Floridan.
2. **None of the remedial alternatives include containment of contamination in the Floridan Aquifer (except as a contingency).** Containment of the Floridan Aquifer should remain under consideration for the following reasons:
 - a. The Floridan Aquifer contamination has not been fully delineated (as described above)
 - b. As of yet no effective remedy demonstrated for the lower hawthorn group that would assure that contamination does not continue to migrate downward into the Floridan.
3. **At a bare minimum, the point of compliance for meeting Florida GCTLs should be the property boundary.** More stringent criteria are necessary for phenols since organoleptic affects occur at concentrations well below the Florida GCTLs. Additional points of compliance should establish that unaffected areas below the Koppers site remain unaffected (demonstrating that the plume is not continuing to

Mr. Scott Miller

August 13, 2008

Page 2

spread) and currently affected areas show a decline in concentrations (indicating that remedial measures are working). The eventual goal for the Floridan should be reaching GCTLs, MCLs and other criteria throughout the Floridan.

Thank you very much 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,

A handwritten signature in black ink, appearing to read "Richard H. Hutton".

Rick Hutton, P.E.

Supervising Utility Engineer

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