April 22, 2011

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: Comments to *Upper Floridan Aquifer Well Installation: Investigation of the Northwestern Area of former Cabot Carbon/Koppers, Inc. Site, Gainesville, Florida*, GeoTrans (September 14, 2010)

Dear Mr. Miller:
The letter provides comments to the *Upper Floridan Aquifer Well Installation: Investigation of the Northwestern Area of former Cabot Carbon/Koppers, Inc. Site, Gainesville, Florida,* GeoTrans (September 14, 2010). Detailed comments by the GRU DNAPL team are attached. Our primary concerns/recommendations are:

1. **Lower detection limits for acenaphthene should be used in order to assist in providing early indication of plume morphology.** Detection limits for acenaphthene have increased substantially since 2008. Acenaphthene detections with the lower pre-2008 detection limits (0.4 ug/l) provided early indication of plume spread. Detection limits from the most recent sampling (August 2010) were 5.4 to 5.5 ug/l (more than 10x higher). These elevated detection limits will impede our ability to recognize the start of an upward trend in COC concentrations. EPA has requested that of Beazer in the past.

2. **The capture area of pumping well FW-31BE should be re-evaluated.** We believe there is uncertainty in the capture zone that GeoTrans presented in the September 14, 2010 report. Also, the capture zone may change as groundwater conditions vary – necessitating periodic re-evaluation based on head measurements. Floridan Aquifer head measurements included in the most recent (April 4, 2011) groundwater monitoring report were limited to a few wells (FW-3, FW-4 and the off-site sentinel wells). At a minimum, water levels in all of the non-Westbay wells should be measured during each sampling event in order to provide better resolution of Floridan Aquifer potentiometric surface and capture zone. We understand that there are difficulties in obtaining reliable potentiometric surface elevations with the Westbays. If there is any way to overcome this difficulty, particularly for FW-28B, this would be very useful in defining the capture zone.

3. **Field data and information in the report further supports the conceptual model that the FLA below the site is heterogeneous and contains solution channels.** The presence of preferred pathways should continue to be considered in future efforts to assess contaminant transport and groundwater capture.

Thank you 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,

Richard A Hutton

Rick Hutton, P.E.
Supervising Utility Engineer

xc: John Mousa (ACEPD)
Kelsey Helton (FDEP)
Mitchell Brourman (Beazer East, Inc.)
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Correspondence