

**GRU Comments to the Cabot Vertical Barrier Wall,  
Cap, and Stormwater System  
May 11, 2018**

GRU offers the following comments based on our understanding of Cabot's 50% design of the vertical barrier wall and cap and the conceptual design of the stormwater pond and discharge pipe. Our understanding is based on our discussion in Gainesville on May 8 with Cabot, Cabot's contractors, EPA, FDEP, ACEPD, and stakeholders.

1. Sample WS-1, located in the center of the western-most Cabot Lagoon exhibited second-highest concentration of 3,4 Methylphenol of all samples reported to date (see the embedded figure). Cabot issued a newer version of this figure on May 4 but the relevant data did not change. The highest concentration was near the NEL. The WS-1 location is near the area that exhibited the very worst odor problem during EPA's initial round of sampling with very strong odors being observed several hundred feet away the day after EPA sampled the area.

The existing data indicate that the western barrier wall should be moved to the west - to include more area around WS-1. GRU understands that the area west of WS-1 is within the footprint of the proposed stormwater pond. Fully characterizing the extent of the contamination identified at the WS-1 location would help determine the extent of the change to the barrier wall alignment.

2. If it is determined that the barrier wall cannot be moved west, then Cabot should fully delineate the contamination and should propose a remedy for that. Any remedy west of WS-1 (extraction wells for instance) would be within the footprint of the stormwater pond.
3. The discharge pipe that will connect the proposed stormwater pond and the existing stormwater sewer line cuts across the proposed containment area. We will defer to City of Gainesville Public Works on this issue, but there may need to be design accommodations to allow future maintenance. One thought we had is that with the current design, the new line will tie into the existing stormwater line inside the containment area. It may be a good idea to move this intersection outside the containment area. The attached figure presents one possible alternate alignment for the stormwater discharge pipe. GRU is not responsible for stormwater, and we didn't get a chance to talk to Public Works before sending this, but due to the tight timeframe we wanted to go ahead and share these ideas.
4. We understand that the stormwater pond must be constructed and functioning before the start of slurry wall construction. We also understand that installation of the slurry wall requires approximately 30 ft of working

space on each side of the wall's centerline. The drawing appears to put the top of the propose pond less than 30 ft from the centerline of the slurry wall. GRU wants to ensure that the slurry wall is not move east to accommodate the pond. The conflict might be resolved by finishing the northern part of the pond after the slurry wall constructed.

