From:	Helton, Kelsey
To:	Miller.Scott@epamail.epa.gov
Cc:	Helton, Kelsey; Kulakowski, Zoe; Hutton, Richard H; John Mousa; Robin Hallbourg; Brourman, Mitch (Pittsburgh) NA; wayne_reiber@cabot-corp.com; Osteen.Bill@epamail.epa.gov
Subject:	RE: Cabot Carbon/Koppers Superfund Site - Cabot- Nov 28. 2007 Add Assess Proposal
Date:	Monday, February 04, 2008 12:59:34 PM

Scott- DEP has reviewed the above proposal and offers the following comments

1) Based on our review of the exiting soil and groundwater data at the Cabot site including NE lagoon area, prior submittals by Cabot addressing the likely vertical migration of contamination to the Hawthorn from the surficial, and GRU's DNAPL team partical tracking submittal; it appears unlikely that significant concentrations of phenol or terpene/terpenoids have migrated into the Hawthorn. This is based on the apparent thickness of the Upper Hawthorne clay in the vicinity of the Cabot site, the lower specific gravity of phenol, the higher viscosity of the terpenes, and the stronger relative horizontal versus vertical flow patterns. We cannot however, dispute that there is some uncertainty here. And ITF-3 being screened in the lower Hawthorn sands is not adequate to put that uncertainty to rest. Nor are the Koppers HG 26-S/D or HG 20-S/D located upgradient of the former Cabot lagoons adequate to base future decisions on the need for an HG MW between the former lagoons and the area of the former NE laggon at N. Main Street. Therefore, we recommend that Cabot install an Upper Hawthorn monitoring well in the vicinity of ITW 13, 14 (west of the interceptor trench) for analysis of the analytes proposed in the above referenced Cabot proposal as well as terpenes and terpenoids.

2) We recommend that the expanded list of MWs include ESE-005 and -006 based on prior elevated levels of naphthalene in those wells and their location on the former Cabot property.

3) We recommend that gw sample analyses include terpenes and terpenoids and identification and quantification of all TICs, as well as analysis for all phenolic compounds under Method 8270, including 2, 4- dimethylphenol. The resulting report should include identification and presentation of resulting data for all compounds detected by Methods 8270 and 8310. We also recommend that free product observed during sampling be analyzed and its density and viscosity determined to better predict its geochemical and physical properties and behavior. In addition, note that the detection limit for PCP should meet the DEP PQL for that analytical method.

4) We are not opposed to the installation of additional monitoring wells or collection of direct push groundwater data in the surficial aquifer to supplement the results of existing downgradient monitoring wells (ITW-17/17EE and 18/18E) and resolve the debate over the effectiveness of the Cabot interceptor trench in capturing the surficial aquifer groundwater contamination.

5) Note that Koppers should be analyzing for terpenes, terpenoids in HG monitoring wells east of the Koppers property boundary if these MWs are to be used to evaluate the possibility of co-mingled plumes.

6) Lift Station odors - As discussed in the February 6, 2006 conference call w/ EPA and Cabot, the Ambient Air Monitoring results contained in the June 13, 2005 email from Cabot Corporation demonstrated that the air emissions from the lift stations are below risk based criteria . A comparison was made assuming that the concentrations for air sampled inside the lift

station would be exhausted by the vent fan at 400 cubic feet per minute. The projected total HAPs emission rate of 0.08 lbs/day was well within the maximum daily HAPs emission limits specified by DEP Chapter 62-785.700. However, recognizing the nuisance issue due to the low odor threshold of phenol, Cabot subsequently installed carbon filters to mitigate this problem on March 1, 2006. DEP's understanding is that Weston, the O&M contractor, has continued to monitor the filters for breakthrough and maintain them accordingly. Unless there are nuisance complaints in the future or changes in site specific emissions or site conditions, DEP also considers this issue satisfactorily resolved. Please keep DEP appraised of any future issues or subsequent air monitoring conducted.

Thank you for the opportunity to review and comment on the proposal.

Kelsey Helton
FDEP- Bureau of Waste Cleanup
Tallahassee, FL
850-245-8969

From: Miller.Scott@epamail.epa.gov [mailto:Miller.Scott@epamail.epa.gov]
Sent: Monday, January 28, 2008 12:19 PM
To: Helton, Kelsey
Subject: Fw: Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

Kelsey,
Here is the submittal that we received. We didn't receive a hard copy.
Thanks,
Scott Miller
Remedial Project Manager
Waste Management Division
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303
Phone (404) 562-9120
Fax (404) 562-8896
----- Forwarded by Scott Miller/R4/USEPA/US on 01/28/2008 12:17 PM -----

wayne_reiber@cab

ot-corp.com

To

12/04/2007 10:01 AM — Scott Miller/R4/USEPA/US@EPA

cc

Bill Osteen/R4/USEPA/US@EPA,
Ralph.McKeen@WestonSolutions.com,
MSwamy@gradientcorp.com,
MSHARMA@gradientcorp.com

Subject

Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

December 4, 2007

Scott Miller
Remedial Project Manager
Waste Management Division
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Scott:

Attached below for your review and comment, please find a document titled "Supplemental Groundwater Quality Characterization Work Plan" for the Cabot Carbon/Koppers Superfund Site in Gainesville, Florida. This work plan defines the scope of supplemental groundwater quality characterization to be conducted at the eastern portion of the Cabot Carbon/Koppers Superfund Site--an USEPA request in response to the Five Year Review Report for the Site.

After you have the opportunity to review this report, could you advice me of USEPA's plan and schedule for completing the review, providing comments, if any, and approving the work. Please do not hesitate to contact me should you have any question or wish to discuss this work.

Sincerely,

Wayne M. Reiber
Manager, Environmental Assessment & Remediation Cabot Corporation

(See attached file: 2007_Workplan_final.pdf)

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Wayne M. Reiber
Manager, Environmental Assessment and Remediation

Cabot Corporation

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wayne_reiber@cabot-corp.com(See attached file: 2007_Workplan_final.pdf)