

November 26, 2007

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 on October 29, 2007 Technology Screening Meeting Minutes

Dear Mr. Miller:

Attached are Gainesville Regional Utilities (GRU) comments to the October 29, 2007 Meeting Minutes which you provided us on October 30, 2007.

We appreciate EPA's commitment to this site. If you need additional information, please contact me at 352-393-1218.

Sincerely,



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

**GRU Comments to
EPA/Beazer Koppers Collaborative Feasibility
Study Technology Screening Summary
and October 5, 2007 Technology Screening Meeting Minutes:**

I. General Comments:

Please provide the basic assumptions for characterizing the contamination in each of the operable units such as degree of DNAPL mobility, extent and characteristics of contamination in the Floridan, points of compliance, and clean up standards. It will be critical to understand EPA/Beazer's Collaborative opinion on these basic assumptions to understand the EPA/Beazer screening and evaluation of remedial alternatives. Based on past characterization efforts, it is our opinion that:

1. DNAPL is mobile under the site;
2. Contamination being measured in the Floridan Aquifer is real and exceeds Groundwater Cleanup Target Levels (GCTLs);
3. Contamination in the Hawthorn and Florida is not fully characterized and there are offsite impacts in the surficial soils, surficial aquifer, Hawthorn Group;
4. Contamination that has been documented in the Floridan Aquifer constitutes a significant threat to the City of Gainesville's water supply; and,
5. All parts of the Florida Aquifer should be cleaned up to meet Florida GCTLs.

In addition to evaluating technologies and combined solutions for all the operable units at the Superfund Site, please consider the timing and phasing of the implementation of these alternatives. With contamination being measured at the GCTL at a depth of approximately 312 feet below ground surface in the Floridan Aquifer at the property boundary (FW-23C), implementing a containment and cleanup remedy in the Floridan Aquifer should take precedence. This will immediately prevent further migration of the contamination in the Floridan Aquifer and allow for longer term remedial actions to be undertaken in the surficial and Hawthorn units.

GRU continues to have particular concern with regard to increasing contaminant levels with depth detected in well FW-12B. In an October 25, 2006 letter from EPA to Beazer East, EPA requested additional Upper Transmissive Zone (UTZ) and Lower Transmissive Zone (LTZ) wells to provide further delineation of the extent contamination. In Beazer's December 18, 2006 response, Beazer agreed to install additional UTZ and LTZ wells (in addition to the perimeter wells FW-24C, FW-22C, FW-23C and FW-4C that were recently completed). GRU continues to believe that additional delineation of the contamination detected in FW-12B is necessary.

II. Specific Comments to Meeting Minutes:

1. Page 3 – Conceptual Understanding of the Site Issues
The minutes state that "GRU presented the Beazer fate-and-transport model to the St. Johns River Water Management District (SJRWMD) as part of their permitting process to increase withdrawals". It should be clarified that GRU provided information related to

the GeoTrans model to the SJRWMD in response to a Request for Additional Information (RAI) from the agency. GRU does not endorse the results of the GeoTrans model.

2. We believe that thermal and surfactant-based technologies could reduce contaminant mass and increase viscosity, and that these technologies should remain under consideration.
3. The ongoing downward migration of DNAPL must be addressed by Hawthorn and Floridan aquifer remedial alternatives.
4. The locations in which the permeability of the lower Hawthorn clay may be enhanced by fractures, bioturbation, or other vertical more highly permeable features and how that might impact hydraulic connection between the Hawthorn and Floridan Aquifers are not known. This uncertainty should be considered in developing remedies.

III. Comments/Questions regarding the Remedial Action Objectives (RAO)

1. When and how will "specific functional objectives/criteria" be developed for each RAO?
2. Either the Soil Risk Management RAO or the Groundwater Risk Management RAO, or both, should also include the objective: "Mitigate further migration of DNAPL creosote in the surficial aquifer and in the Hawthorn Formation". For this RAO, some of the technologies already screened out, i.e. surfactant mobilization and various thermal methods, should be considered further. Although these technologies may not result in complete removal of NAPL, they may be able to achieve removal or increase DNAPL viscosity sufficient to eliminate the potential for further migration as NAPL.
3. Evaluation Criteria: ARARs should include FDEP GCTLs and SCTLs.

IV. Specific Comments to Attachment 5 – Technology Screening Notes

Water Treatment Technologies

No comments.

Water Disposal Options

No comments.

DNAPL Remediation Technologies (In Situ)

1. Soil Flushing and Thermal Desorption technologies should be considered further.
2. Vertical Barrier – will be ineffective without vertical containment.

Surface/Shallow Soil Remediation Technologies (In Situ)

1. See comments to DNAPL Remediation Technologies (In Situ)
2. The standards for clean up must be established for surface and shallow soils to consider the remediation of onsite and offsite impacts.
3. It is the City of Gainesville's position that, because the Koppers property is located in a key location in the City, close to other redeveloping areas and revitalizing residential areas, Florida residential soil cleanup standards should be applied.
4. In addition GRU has concerns about the impacts of off-site surficial soil contamination on GRU operations.

Groundwater Remediation Technologies (In Situ)

1. Directional wells: It may be possible for directional wells to play a role in remedial alternatives. They should not be eliminated at this stage of the process.
2. Groundwater Injection: could be used in conjunction with Groundwater Extraction.

Surface Water and Sediment Remediation Technologies (In Situ)

No comments.

Removed Soil/DNAPL: Treatment Technologies

No comments

Removed Soil & Residue: Disposal Options

No comments

Removed DNAPL: Disposal Options

No Comments