



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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September 11, 2007

Mr. Wayne M. Reiber  
Manager, Environmental Assessment & Remediation  
Cabot Corporation  
Two Seaport Lane, Suite 1300  
Boston, MA 02110-2019

Subject: Five-Year Review – Cabot Carbon/Koppers Superfund Site  
Gainesville, Florida

Dear Mr. Reiber:

This letter is in response to Cabot Corporation's (Cabot's) July 27, 2006, letter regarding the Five-Year Review Report for Cabot Carbon/Koppers Superfund Site. These issues were discussed in June 12, 2006, and subsequent August 9, 2006, conference calls between Amy McLaughlin, the previous Site Remedial Project Manager for the U.S. Environmental Protection Agency (EPA), and you. The July 27, 2006, Cabot letter characterized all issues with the possible exception of one item (Interceptor Trench Effectiveness) as requiring no follow-up actions. As was communicated in the August 9, 2006, conference call between Amy McLaughlin and you, EPA does not concur with this assessment. We understand how the nature of verbal communication can result in misunderstandings between parties. Therefore, we will detail our concerns below related to Cabot's Five-Year Review items:

**Five-Year Report Issue #1: Potential for contamination in Hawthorn Group deposits at the Cabot Site.**

We understand that Cabot believes that it should not be responsible for installing and monitoring Hawthorn wells since Cabot's belief is that deeper contamination below the surficial aquifer would be from creosote associated with the Koppers portion of the Site and not from former Cabot operations.

The possibility of Hawthorn contamination that may be attributable to Cabot Carbon was raised in the Five-Year review. Beazer is currently implementing a groundwater monitoring program in the Hawthorn Group that includes placement of monitoring wells to the east of the Koppers property. Monitoring of these wells may uncover contamination that appears to be attributable to a source other than something on the Koppers property. If this situation occurs, then Cabot will need to propose additional Hawthorn wells to investigate the potential for contamination attributable to Cabot Carbon to have migrated into the Hawthorn Group, or perhaps deeper.

Available data do not confirm that significant contamination from Cabot Carbon is present in the Hawthorn. Nevertheless, there is some potential for such migration to occur. Any indications of significant movement of Cabot-derived contaminants into the Hawthorn will trigger the need for further investigation of that possibility. Note that prior monitoring of Hawthorn Group well ITF-3 has shown benzene concentrations above the Florida drinking-water Maximum Contaminant Level (MCL). The last sample reported from this well with benzene was obtained in 1994. Three samples from ITF-3 were obtained by Koppers in 2003/2004. These samples indicated no benzene was present and only inconsequential concentrations of other contaminants were present. If resampling ITF-3 indicates there is presently contamination of concern, those data should trigger additional investigation of the Hawthorn Group in the area of identified Cabot contamination, including Hawthorn monitoring in the vicinity of the former northeast lagoon.

### **Five-Year Report Issue #2: Former Cabot lagoons may be acting as a source.**

There appears to be confusion related to this topic as characterized in Cabot's July 27, 2006, letter. The conclusion in the Cabot July 27, 2006, letter was that there was no need for additional data collection at this time. As communicated in the August 9, 2006, conference call, additional surficial aquifer data collection is necessary to determine conclusively if the former Cabot lagoons are acting as a source. This possibility was raised in the Five-Year Review and needs to be addressed by Cabot through acquisition of the requested groundwater quality data. The Five-Year Review recommended cleaning and resampling of all of the surficial wells installed in 1984 to 1995 investigations. It would be important to an understanding of current groundwater contamination conditions if all of the available monitoring wells east of the Koppers property and downgradient or potentially downgradient of potential sources (or former sources) of contamination attributable to the Cabot were monitored at least once for the contaminants of potential concern associated with the Cabot Carbon Site. EPA requests that Cabot conduct a one-time monitoring event, which would include all of the available monitoring wells east of the railroad tracks beginning with the ITW-6/ITW-7 pair and extending northward (all such wells are shown on Figure 3-1 of the report "Results of Quarterly Groundwater Sampling Conducted March 20-22, 2007, For First Quarter 2007, Eastern Portion of the Cabot Carbon/Koppers Superfund Site, Gainesville, Florida." and include ITF-3, the Hawthorn Group well shown on the figure).

Groundwater sampling was conducted by Cabot in March 2005. The 2005 data demonstrated the continuing presence of several contaminants of concern in groundwater around the former Cabot lagoons. Follow-up monitoring in this area can be used to determine if this contamination has changed in concentration. Results from the one-time monitoring can be reviewed to determine if there is a need for any change to the set of wells currently routinely monitored by Cabot. The one-time monitoring data will also be useful for deciding if any need exists for further evaluation of the Cabot lagoons as a continuing groundwater contamination source.

### **Five-Year Review Report Issue #3: Interceptor trench effectiveness**

EPA continues to believe, as stated in the Five-Year Review report, that the interceptor trench effectiveness needs to be evaluated. Cabot provided a groundwater flux calculation in a previous submittal which attempted to quantify that the interceptor trench is capturing the entire thickness of the surficial aquifer. EPA does not believe that the groundwater flux calculation used was a valid approach to make this determination. As was stated in the Five-Year Review report, Cabot's conclusion that the interceptor trench is effective is questionable because the deepest groundwater collection piping in the interceptor system is 12 feet below ground surface and the surficial aquifer is approximately 28 feet deep. In addition, the only current factor utilized in this trench effectiveness determination are two downgradient monitoring wells.

EPA requests that Cabot propose additional monitoring plans (e.g., temporary surficial wells downgradient of the interceptor trench) to collect groundwater data to determine interceptor trench effectiveness and to show that the interceptor trench is effective in capturing surficial aquifer contamination attributable to the Cabot Site. This demonstration needs to include relevant data obtained from sampling versus theoretical approaches that do not involve Site data.

### **Five-Year Report Issue #4: Frequency of development and sampling of monitoring wells**

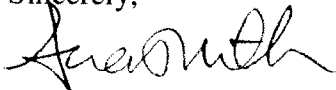
There is agreement on Cabot's proposal to redevelop the wells in the quarterly monitoring program during the next monitoring event.

### **Five-Year Report Issue #5: Lift Station Odors**

The Alachua County Environmental Protection Department has followed up on this issue, and EPA considers it resolved.

Thank you in advance for your attention to this matter. If Cabot disputes these conclusions or desires to discuss these issues further, please contact Scott Miller at (404) 562-9120 or via e-mail at [miller.scott@epa.gov](mailto:miller.scott@epa.gov) within ten days of receipt of this letter. Otherwise, the EPA expects to receive a workplan proposing Cabot's approach to addressing these items within sixty days of receipt of this letter.

Sincerely,



Scott Miller  
Remedial Project Manager  
Superfund Remedial Branch, Section C  
Superfund Division