

MAR 05 2004

PROTECTION  
DEPARTMENT

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

Mr. Brett Goodman, P.E.  
Senior Water/Wastewater utility Engineer  
Gainesville Regional Utilities  
P. O. Box 147117, Station A134  
Gainesville, FL 32614-7117

February 27, 2004

Re: Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

Dear Mr. Goodman:

EPA has received your letter dated January 27, 2004 regarding the recommendation to EPA. EPA is in total agreement for the need to aggressively pursue cleanup of the site by Beazer. EPA is committed to pursue a cleanup effort that will meet the criteria mandates by the National Oil and Hazardous Substances Pollution Contingency Plan.

Knowing the history of investigation and remedial activity at the site, I am sure you realize the importance of basing a remedy on sound data and a good understanding of the contaminant transport conditions at the site. As you are aware, the contamination in the deeper zones reported in September, 2003 has prompted us to alter our approach to the cleanup. At our meeting on December 18, 2003 all stakeholders present agreed on shifting the strategy to focus on source remediation. Source remediation is the only mean that assures us that larger masses of contaminant do not leak into the deeper zones.

Your statement in the January 27 letter about not feeling that EPA is not taking the necessary steps to prevent further degradation of the Floridan aquifer leads me to believe that there is a need for me outline the new remedial strategy discussed in the December 18, 2003 meeting:

1. The overall objective of the remedial strategy is to complete an effective, timely cleanup that best meets the criteria defined in 40 CFR Part 300, the National Oil and Hazardous Substances Pollution Contingency Plan.
2. The detection of contamination in the Floridan Aquifer points out the need and the urgency to address source contamination. While there is contaminants detected in the Floridan, the majority of the mass of contaminants is in the surficial aquifer. The initial remedial step must include controlling and discontinuing discharge of contaminants from source areas to the deeper zones. This will prevent contamination detected in the deeper Hawthorn and Floridan from increasing in concentration.

3. The next stage of the remedial action is to address contaminants that has already migrated to the deeper zones, determine the extent of contamination, and the appropriate remedy. This component will complete the remedial at the site.

To facilitate a timely and effective process EPA plans to utilize all regulatory tools available, including, if necessary, designating the source area as a separate operable unit. This may provide flexibility to move forward with a remedial plan for the source area independent of the rest of the site.

Since the remediation strategy has shifted and since a containment-only remedy will not be acceptable, it is necessary to evaluate remedies that treat or remove the source area in an amended Feasibility Study (FS). Once the FS is completed, a proposed plan can be drafted and a remedial plan can be recommended to the community. To get to that goal, EPA has asked Beazer to submit a schedule which will take the project from the current sampling activities to the completed FS, taking into consideration the fact that source remediation is a priority and may be independent of the rest of the remedial plan. Upon agreeing on the schedule, EPA will complete the project schedule leading to remedial action. It is our intention to have such schedule available by April 2004.

Regarding the abandonment of monitoring well FW-1. EPA has asked Beazer to include it in the well abandonment program, and Beazer has agreed to do so. It is our understanding that Beazer is working with the Water Management District and ACEPD to complete this well abandonment.

Additionally, at the December 18, 2003 meeting EPA proposed a monthly meeting / teleconference to take place on a monthly basis between EPA, Beazer FDEP, ACEPD, and GRU. This forum will provide an opportunity to all parties to share information regarding progress of the project, and participate and voice any concerns.

If you have further questions regarding the site please feel free to contact me at (404) 562-8917.

Sincerely,



Maher Budeir, P.E.  
Remedial Project Manager

cc: Thomas D. Bussing, Mayor, City of Gainesville  
Mike Byerly, Chairman, Alachua County Board of County Commissioners  
John Mousa, ACEPD  
Chris Bird, ACEPD  
Kelsey Helton, FDEP  
Kim Zoltek, GRU  
David Richardson, GRU  
Bob McVay