UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

61 Forsyth Street
Atlanta, Georgia 30303-3104

October 11, 2010

Mr. Wayne Reiber, Manager
Environmental Assessment & Remediation
Cabot Corporation
Corporate Safety, Health and Environment
Two Seaport Lane
Suite 1300
Boston, MA 02210

Re: May 2010 Cabot Carbon Hawthorn Group Sampling Results and Revised Work Plan
Gainesville, Florida

Dear Mr. Reiber:

Thank you for the update to the Cabot Carbon Hawthorn Group Work Plan dated May 25, 2010. Our comments on the document are as follows:

1. Figure 1 shows the locations of two new pairs of Hawthorn Group monitoring wells. The proposed location for the HG 30-S/D wells is acceptable. The proposed location for HG-28S/D is unacceptable as a location for the second proposed Hawthorn well pair (although if there is a large plume, wells may be needed there and can either be completed as a part of the proposed effort or can be added in the future). In late February 2010, after some discussions with the Contractor representing Cabot Carbon, it was our understanding from that Contractor that a pair of wells would be proposed for a location in the approximate area that we had identified as probably being most advantageous for new Hawthorn wells to be located outside of the immediate area of the former Cabot Lagoons. Previous Figure 1 (February 18, 2010 version) showed the proposed location. The revised Work Plan now proposes that the Hawthorn wells be located about 1000 feet away from the immediate area of the former Cabot lagoons (reference Work Plan page 7; Figure 1 dated 5/24/2010). Based on the nature of the Hawthorn permeable zone materials and the apparent relationship between source areas and downgradient extent of significant Koppers property-derived contamination in the Hawthorn Group, we do not recommend locating the most downgradient Hawthorn well pair 1000 feet away from the suspected source area. As noted above, wells that distance from the source area may ultimately be needed to define the extent of contamination, and Cabot could go ahead and install wells there, in addition to a pair of wells in the location they agreed to in the Figure 1 that was prepared in February 2010. Considering that the proposed installation of wells would logically be based on a projection of the potential extent of contamination, it would be reasonable to install the third most downgradient well pair now.

Note that on page 7 of the Work Plan, there is a statement "Based on the sampling results for the two proposed Hawthorn Group well pairs, the need for the installation of a third Hawthorn Group well pair at the Site will be evaluated." It is already clear that contamination is present at HG-29S/29D that is attributable or likely attributable to a Cabot Carbon source. If there is no contamination at either of Cabot's proposed new well pairs, there would still be a need for defining the downgradient extent of Hawthorn contamination away from the HG-29 well pair, particularly because we do not concur with Cabot's supposition that the HG-29 contamination is a result of leakage due to well construction. Thus, the absence of contamination at proposed HG-30S/D and proposed HG-28S/D could not be used as a rationale for not defining the extent of contamination downgradient of the existing HG-29 well pair.

2. Note that the Hawthorn wells completed at the approximate location previously discussed and presumably agreed upon (proposed location as per Figure 1 version dated February 18, 2010) will be close to two nearby surficial aquifer monitoring wells ITW-15 and ITW-16. ITW-15 and ITW-16 should be sampled, if possible. Monitoring constituents should be consistent with those proposed for other wells (see Work Plan Table 2).

We look forward to working with you in implementing this Work Plan in the near future. If we may be of assistance in this matter, please contact me at (404) 562-9120 or via Internet e-mail at (404) 562-9120.

Sincerely,

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