

**Cabot/Koppers Superfund Site****Five-Year Review Interview Form**Site Name: Cabot/KoppersEPA ID No.: FLD980709356

Interviewer Name: \_\_\_\_\_

Affiliation: \_\_\_\_\_

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Time: \_\_\_\_\_

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1. **Are you aware of the former environmental issues at the Site and the cleanup activities that have taken place to date?** I am aware of the previously implemented remedial actions at the Cabot and Koppers sites. ACEPD has been involved with the site for over 25 years. Since 2001 in particular, the Alachua County Environmental Protection Department (ACEPD) staff including myself have been actively involved in monitoring the remedial investigation and pilot remedial projects on site and in commenting to EPA and Beazer East on reports and technical documents.
  
2. **Do you feel well-informed regarding the Site's activities and remedial progress? If not, how might EPA convey site-related information in the future?** ACEPD and myself personally have usually been informed about the Site's remedial activities for the last several years via communications from the USEPA Remedial Project Manager and Beazer East and through technical review of reports and documents. There have been a few times in the past when ACEPD has not made aware of activities or meetings at the site in a timely manner. However, communication with the general public has not been particularly strong by USEPA prior to the last two years about the remedial and investigation activities ongoing at the site. In particular, discussions about site reuse issues with the community have come at a late stage in the process. USEPA needs to continue its stronger public outreach and involvement efforts with the public and especially the Stephen Foster Neighborhood west of the Koppers site when developing remedial alternatives, developing the ROD and implementing the remedial plans
  
3. **Have there been any problems with unusual or unexpected activities at the Site, such as emergency response, vandalism or trespassing?** I am not aware of any serious problems with emergency response, vandalism or trespassing at these sites. However, until recently, it may have been possible for trespassers to gain access to the former Koppers site from the northeast corner near the railroad tracks due to a lack of fencing in this area. This issue appears to have been resolved by Beazer in recent months by erecting a fence along this northeast boundary area. The discharge of untreated and uncontrolled stormwater from the Koppers site has been ongoing issue of concern. Untreated stormwater was leaving the site through the main ditch crossing the site and through runoff across the railroad tracks to the east. Excessive stormwater flows to the east and northeast have caused erosion to occur under the adjoining CSX railroad tracks to the east. Additionally there have been occasional complaints from neighboring residents about excessive dust generation raising their concern about potential harmful human exposure to toxic contaminants from the site especially when

it has been an active Koppers wood treating facility. Beazer is currently implementing interim measures to mitigate some of these stormwater and dust issues. A significant remaining issue that has not been resolved is the lack of warning signs on the fence line of the former Koppers site advising the public of the contamination on this superfund site. In addition, no fencing has been installed to limit access to the offsite area near the western Koppers site boundary that has been recently identified to have contamination above FDEP Soil Clean-up levels of concern.

4. **Are you aware of any changes to state laws or local regulations that might affect the protectiveness of the Site's remedy?** There has not been any remedy implemented for the source area contamination and surface soils both on and off the site. Since the previous 5 year review in 2006, there has been contamination above the State of Florida Soil Clean-up Target Levels for dioxin, benzo-a-pyrene and arsenic detected in the rights of way in the neighborhoods offsite to the west of the Koppers site. The levels found are not protective of human health according the FDEP criteria. There has also been significant contamination found in the Floridan Aquifer groundwater beneath the site and near the northwestern boundary of the Koppers site. The previous remedial actions put in place have not addressed this contamination which poses a continuing threat the City well field.
5. **Are you aware of any changes in projected land use(s) at the Site?** I am aware the City of Gainesville is investigating the future land use for the site. A better understanding can be obtained from the City of Gainesville.
6. **Has EPA kept involved parties and surrounding neighbors informed of activities at the Site? How can EPA best provide site-related information in the future?** EPA has not done an adequate job of soliciting citizen involvement and keeping neighboring residents informed about the activities and plans for the site. The Community Involvement plan for the Site was not updated for several years. It has also been difficult for technical advisors support the neighborhood residents and citizens to review the entire record of documents for the site, since not all data on groundwater or soils is consolidated and available. In addition the public until recently has complained about the lack of an updated Site File and Administrative Record in the local library repository. Recently, USEPA has made a more concerted effort to solicit citizen input and get information out to residents. This is a good sign. In the future more regular mailings or site updates and notification of major site activities to minimize misinformation in the neighborhood surrounding would be desirable.
7. **Do you have any comments, suggestions or recommendations regarding the project?**  
ACEPD has comments and suggestions of a technical nature on the need for additional investigations and actions at the site that are described below and were provided as comments and recommendations on the USEPA Superfund Proposed Plan for the Cabot Carbon/Koppers Superfund Site (dated July 2010) by the City of Gainesville and Alachua County (October 2010) and is included as **Attachment A**. Below is a brief description of essential comments and recommendations.

### **Koppers Off-site Surface Soils**

ACEPD was instrumental in recommending sampling of off-site soils surrounding the Koppers portion of the Cabot/Koppers Superfund site. Initial offsite soil sampling began in 2009 , with several additional incremental sampling events conducted to determine how far west of the site off-site soil contamination with extends. The most recent sampling occurred in September 2010 and included sampling private properties to the west of the site to delineate the areas prior to

remediation, initial sampling to the north, east and south of the site, and background sampling in several areas in Gainesville. Since this work has now taken several years, ACEPD as well as citizens living in the neighborhood with potentially affected properties, and the citizens at large are extremely frustrated with the process. Additionally, Beazer East, Inc. continues with risk assessments in an attempt to limit the need to remediate off-site contaminated soils that exceed state clean-up criteria. Detailed comments regarding this issue are presented in the last paragraph on page 22 of Attachment A. ACEPD does not approve of the extended incremental process used to assess off-site soil contamination on public (City of Gainesville road right-of-ways) and private property. This work should immediately be expedited and all off-site soils exceeding the State of Florida soils criteria remediated.

### **Springstead and Hogtown Creek Sediment Issues**

ACEPD, under a grant (contract) with USEPA, conducted a sediment evaluation in Springstead and Hogtown Creeks downstream of the Cabot/Koppers Superfund Site. The evaluation focused on “tarry materials” that have persisted in the streambeds of the creeks since the release of these materials from the former Cabot Corporation lagoons in 1967 when the property was developed for a shopping center. Numerous areas of buried and exposed sediment were located by ACEPD staff. A report detailing the work (August 2009) and addenda supplementing the work (September 2010) are included as **Attachment B**. ACEPD has met with Cabot Corporation, their consultants, FDEP and USEPA and Cabot has voluntarily agreed to remove the “tarry materials” from the streambed to the extent that it is feasible and will not do further harm to the aquatic ecosystem. Plans were to conduct the sediment removal in fall/winter (2010/2011) dry season. Some sediments in the streambed of Springstead Creek were found to contain dioxins above state standards; the dioxin was not associated with the “tarry materials” and was found downstream of the Koppers ditch outfall indicating that the Koppers portion of the site was the likely source of the elevated dioxins. ACEPD recommends that the contaminated sediments in the creeks be removed and that the stormwater, which appears to be the source of the dioxins, be treated prior to discharge to reduce dioxin loading to the sediments (see Koppers Stormwater Study section below).

### **Koppers Stormwater Issues**

ACEPD, under a grant (contract) with USEPA, conducted a stormwater study at the Koppers portion of the site. The study focused on first-flush sampling of the outfall at the northern end of the property where untreated stormwater from the site discharges to Springstead Creek. Several stormwater sampling events, December 4-5, 2009, March 11, 2010 and August 26, 2010, were conducted and summary reports prepared. The sampling and reporting showed elevated levels of metals (arsenic, copper and chromium), suspended solids and dioxins discharging from the ditch. Copies of these reports, which were submitted to USEPA, are included as **Attachment C**. Under a consent order with Florida Department of Environmental Protection (FDEP) Beazer has implemented interim stormwater measures to improve discharge water quality. The proposed FDEP draft permit will require Beazer to monitor stormwater quality for dioxins, selected metals, and suspended solids. ACEPD recommends that this effort be evaluated closely to see that discharge of contaminants off-site in stormwater is stopped by the implementation of the interim stormwater controls and, if not effective, these controls must be improved to prevent site related contaminants from being discharged off-site.

### **Koppers Site Hawthorn Group Contamination**

ACEPD has several concerns regarding contamination in the Hawthorn Group (intermediate aquifer). The Hawthorn Group formations function as confining units and aquifers in which ground water movement and contaminant migration is complex and difficult to assess. There are four primary source areas on the Koppers site and contamination has been detected in the Upper Hawthorn Group at all four source area and free-phase product (creosote) is currently being recovered from monitoring wells in the Upper Hawthorn Group at three of these sources areas (North Lagoon, Drip Track, and Process Area). ACEPD has noted the following deficiencies (also see pages 13 and 14 in Attachment A) and requests that these items be addressed:

1. The horizontal and vertical extent of contamination in the Hawthorn Group on site has not been determined. The extent of contamination in source areas in the Hawthorn Group may have a greater footprint than in the surficial aquifer. Additional delineation of the source areas in the Hawthorn Group is needed, especially in the process area where contamination in the Hawthorn from Koppers site has migrated off-site to the east, concentrations of naphthalene in HG-26S for 5/26/2010 were reportedly 2,300 ug/L.
2. There are no Lower Hawthorn Group monitoring wells in the former South Lagoon or Process Area. This is a significant deficiency because there is free-phase product in the Upper Hawthorn at the Process Area and contamination of the Lower Hawthorn Group in this area is likely.
3. Site-wide monitoring of the Upper and Lower Hawthorn Group is lacking. There are no Upper or Lower Hawthorn Group wells along the northern property boundary. Samples from one off-site private irrigation well to the north of the site with a total depth of approximately 67 feet has been found to have low concentrations of site related constituents including naphthalene, acenaphthene, anthracene and 1-methylnaphthalene.
4. Due to the geologic complexity of the Hawthorn Group and the scarcity of wells across the site flow directions in the Upper and Lower Hawthorn Group may not be well defined.
5. Additional Hawthorn Group wells should be installed and the Koppers site comprehensive monitoring plan should be amended to include monitoring of these additional Hawthorn Group wells.

### **Koppers Site Upper Floridan Aquifer Contamination**

ACEPD has several concerns regarding contamination in the upper Floridan aquifer at the site. There were high levels of site related constituents in the Floridan aquifer in samples obtained from well FW-12B and FW-27B in the north central portion of the site and in FW-16B on the central eastern site boundary. Naphthalene concentrations reported for the six zones monitored in FW-27B ranged from 560 to 1,700 ug/L. Although FW-27B is interior to the site, these levels of contamination in the Floridan aquifer are a concern for the Murphree Wellfield that supplies the City of Gainesville and private drinking water wells in proximity to the Koppers site.

ACEPD has the following recommendations regarding the Floridan aquifer on the Koppers site:

1. Focus hydraulic containment in source areas or where contamination is greatest to more effectively recover contaminants. The hydraulic containment at the northwest property boundary (FW-31BE) has the potential to draw contaminants toward the property boundary.
2. Additional characterization of the groundwater plume associated with FW-12B and FW-27B is needed. ACEPD is especially concerned about contamination at depth in FW-

27B.

3. Re-evaluate the low-flow pumping IRM at FW-6 and FW-21B for effectiveness and address contamination migrating off-site to the east at FW-16B.
4. Develop and implement a site-wide plan for containment of contaminants in the Floridan aquifer (see pages 2 and 3 of Attachment A).

### **Cabot Site Hawthorn Group Contamination**

Contamination has been detected in the Hawthorn Group on the Cabot portion of the Cabot/Koppers Superfund site. Data from Hawthorn Group wells HG-29S and HG-29D shows contaminants related to the former Cabot operation (methylphenols) in high concentrations. ACEPD has several concerns regarding contamination in the Hawthorn Group (intermediate aquifer) and the Floridan aquifer on the Cabot portion of the site:

1. It is imperative that the proposed plan developed by Cabot and approved by USEPA be implemented to determine the extent of contamination in the Hawthorn in proximity to the former Cabot Lagoons.
2. Given the presence of high concentrations of contaminants in Hawthorn Group wells FW-29S and FW-29D Floridan aquifer monitoring is needed on the Cabot site. ACEPD recommends installation of multi-zone wells, similar to those installed on the Koppers site be installed downgradient of the former lagoon on the Cabot property.

### **Contaminant Reporting**

ACEPD has noticed a change in laboratory reporting limits and the number of constituents reported in groundwater samples in recently reported groundwater data from the Koppers and Cabot sites. Raising the detection limits to meet the standards and reducing the constituents reported is not acceptable. Reporting accurate data at low levels and reporting full suites of analytes, such as SVOCs, is imperative to understanding groundwater contamination at the site. ACEPD recommends requiring both responsible parties to report the lowest detection limits possible and report full suites of parameters.