



Alachua County Environmental Protection Department

Chris Bird, Director

July 13, 2005

Ms. Amy Williams
Remedial Project Manager
Superfund Remedial and Technical Support Branch
Waste Management Division
EPA Region 4
61 Forsyth St., S.W.
Atlanta, GA 30303 – 8960

Re: ACEPD Comments on 1st Quarter 2005 Floridan Aquifer Groundwater Monitoring Report
Cabot/Koppers Superfund Site, Gainesville, Florida

Dear Ms. Williams:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the 1st Quarter 2005 Floridan Aquifer Groundwater Monitoring Report dated July 6, 2005 prepared by RETEC Group, Inc. ACEPD has the following comments and concerns:

- 1) The pH measurements for Wells FW3 and FW6 seem to be very high near pH 11. These high pH readings are unusual and there is no explanation of these high readings in the report. The concern is the possibility that cement grout may be leaching into these wells or other problems with well construction. The higher pH may be biasing the measured concentration of metals in these wells. This concern needs to be addressed or the metals data from these wells needs to be highly qualified.
- 2) Review of the laboratory quality control and data validation reports indicates that the laboratory, Columbia Analytical Services (CAS), had significant problems with the quality control for phenolic compounds in the samples analyzed. The recovery of spike control surrogates (phenol-d6, 2-fluorophenol, and 2,4,6-tribromophenol) was very low for almost all of the samples. The recovery was below 10% for many of the analytes in the actual field samples. In addition the recovery of pentachlorophenol in the matrix spike for sample FW-7 was "zero". While the data is labeled with a "J" flag in the report indicating that these are estimated values, ACEPD does not agree that these data are even reliable "estimates" for these compounds. It should be noted that in the 4th Quarter 2004 Floridan Monitoring report, the surrogate recoveries for the phenols was much higher and the actual field sample concentrations were higher. Because of these quality control issues, ACEPD believes that the analytical results for phenol, the methyl- and dimethylphenols and pentachlorophenol are invalid and useless for determining the presence or absence of these compounds and for determining any trends in concentration data.
- 3) Due to the unreliability of the phenolic data, any trends observed that indicate that contaminants in FW7 and FW3 are going down from initial levels needs to be highly qualified

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and may be highly misleading. This is especially applicable in the case of FW7 which had the methyl phenols as the main organic contamination when originally sampled. Because of the QC issues with the data, it is inaccurate to state based on this quarterly sampling data that any wells do not contain organic contaminants above state of Florida standards. While the level of contamination observed currently may be lower than that observed previously, ACEPD disagrees with the statement in the report that "wide-spread groundwater impacts are not present in the Upper Floridan Aquifer beneath the site". Significant groundwater impacts continue to be observed in FW6 which is in the Floridan Aquifer beneath the site.

4) The summary of results in Table 3 of the report does not provide the method detection limit or the reporting limit for each analyte. One has to refer to the appendix to determine the method detection limits for each analyte. This data reporting procedure is not consistent with the reporting procedure used in the 4th Quarter 2004 report and makes it more difficult to determine what not detected "U" flag means and to compare data across quarters. Also there is a question about whether the laboratory is reporting a "not detected" as below the lab reporting limit or the method detection limit. The method detection limit was used for reporting in the 4th Quarter report and ACEPD recommends that this consistent approach be used.

5) ACEPD continues to be concerned with the potential source of contamination that has been observed in FW3 in any of the sampling periods. The contamination detected in this well, which is located on the western boundary of the site northwest or southwest of known source areas, may be indicative of possible drag down of contaminants from contaminated zones located in the Hawthorn Group or surficial aquifers at the western boundary of the site or could indicate actual Floridan Aquifer contamination. There has been no clear explanation given as to reasons for contamination in this well, especially if the flow direction in the Upper Floridan Aquifer is to the northeast as has been assumed. This western boundary contamination is especially concerning when one considers the Geirsbach well which was contaminated and located just off the western boundary. This issue needs to be addressed.

6) ACEPD would appreciate being notified by RETEC, Beazer or EPA of the schedules for quarterly sampling of the Floridan wells or the start of other field activities in a timely manner (say about 1 week advanced notice) to allow ACEPD staff the opportunity to be present to observe sample collection and other activities at the site. This is also important so that ACEPD may fulfill its obligations to the USEPA as part of our Cooperative Agreement for oversight of field activities.

If you have any questions about these comments, please call me at (352) 264-6805 or email at jmouso@alachua.fl.us.

Sincerely,



John J. Mousa, Ph.D.
Pollution Prevention Manager

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