

From: John Herbert on behalf of John Mousa
To: [Scott Miller](#)
Cc: [Richard H. Hutton](#); [Stanley Feenstra](#); [Richard Jackson](#); [Kelsey Helton](#); [Rusty Kestle](#); [Brouman Mitch \(Pittsburgh\) NA](#); [Jim Erickson](#); [Greg Council](#); [Wayne Reiber](#); [Joshua Hayes](#); [Cline Patricia](#); [Bill Osteen](#); [Carrie McCoy](#); [Stewart E. Pearson](#); [John Herbert](#)
Subject: ACEPD Comments to the Koppers South Lagoon ISGS Work Plan
Date: Friday, May 15, 2015 10:33:00 AM

Scott,

ACEPD generally supports and agrees with the May 13, 2015 comments provided to USEPA by GRU's technical team regarding the Former South Lagoon Preliminary Design and Design Investigation Work Plan provided by Tetra Tech and Beazer East dated April 29, 2015. We particularly agree that TIPs should be installed in all characterization borings and that the TIPs should extend to top of middle clay and that a more denser spacing of TIPs would be preferred for the South Lagoon Area.

We remain concerned that the data from the Process Area indicates that hydraulic fracturing of contaminated zones could be occurring and that the ISGS treatment will not be effective in totally achieving the treatment or immobilization of the free DNAPL in the target areas.

Thank you for the opportunity to comment.

John