



# Alachua County Environmental Protection Department

Chris Bird, Director

April 5, 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 Addendum to the Floridan Aquifer Monitoring Plan Supplemental Upper Floridan Aquifer Monitoring Well Installation, Koppers Inc. Site Gainesville, Florida  
Dated February 28, 2005

Dear Ms. Williams:

The Alachua County Environmental Protection Department (ACEPD) is enclosing as Attachment 1 with this letter specific comments and recommendations concerning the above referenced Floridan Aquifer Monitoring Plan at the Koppers Superfund Site.

If you have any questions about these comments please contact me or Robin Hallbourg at 352-264-6800.

Sincerely,

John J. Mousa, Ph.D  
Pollution Prevention Manager

CC: Mike Slenska, Beazer East, Inc. (e-mail)  
Kelsy Helton, FDEP (e-mail)  
Robin Hallbourg (e-mail)  
John Mousa

Brett Goodman, GRU (e-mail)  
Paul Myers, ACHD (e-mail)  
File Copy (1658 Green)  
Rick Hutton, GRU (e-mail)

**Attachment 1:** ACEPD Comments on Addendum to the Floridan Aquifer Monitoring Plan,  
Dated February 28, 2005



April 5, 2005

**Attachment 1**  
**ACEPD Comments on Addendum to the Floridan Aquifer Monitoring Plan**  
**Supplemental Upper Floridan Aquifer Monitoring Well Installation**  
**Koppers Inc. Site Gainesville, Florida**  
**Dated February 28, 2005**

1. The supplemental Floridan aquifer monitoring plan should be modified to provide greater aerial coverage in proximity to the source areas. ACEPD does not recommend installation of wells FW-10C and MW-1C in the upper Floridan aquifer LT zone at this time.
2. ACEPD requests the Floridan aquifer monitoring plan be modified to provide greater aerial coverage in the form of a well transect through the northern portion of the site and along the eastern property boundary. This will allow monitoring of the upper Floridan aquifer UT zone downgradient of all four source areas. This can be accomplished by relocating proposed UT Floridan aquifer wells FW-4B, FW-10B, FW-11B, FW-12B, and constructing additional UT Floridan aquifer wells in lieu of monitoring the LT zone.
3. The proposed 60-foot open-hole section for the upper Floridan aquifer UT zone wells is a concern. There may be movement of groundwater through the section, potentially allowing water to move vertically and horizontally within the wellbore. If significant flow zones are encountered within a well, actions (i.e. plugging back or setting casing/grouting) must be taken to eliminate intra-aquifer flow.
4. The former Koppers production well was plugged in late 1991 and geophysically logged by Woodward-Clyde (for Beazer East, Inc.) prior to well abandonment. These existing geophysical logs may be useful in evaluating hydraulic properties in the upper Floridan aquifer. It should be noted that results of sampling the former production well on October 25, 1990 (Beazer East, Inc.) indicated the presence of numerous PAHs, with naphthalene concentrations of 30.0 and 28.9 ug/L reported for duplicate samples. The presence of these contaminants was reportedly due to problems with casing integrity.
5. All wells should have surface casing installed into the top of the Hawthorn Group sediments. Although contamination is present in the upper Hawthorn Group formation (intermediate aquifer), the lower units must be protected from further degradation.
6. Well construction activities should be conducted with minimal additions of water or drilling fluid. Rotasonic drilling should be conducted as "dry" as possible. Any water added during well construction should be volumetrically measured or tagged with a conservative tracer and subsequently removed through well development prior to sampling.
7. Well development should include monitoring dissolved oxygen in addition to pH, specific conductance, temperature, and turbidity. Well development must be conducted until field turbidity is <10 NTU and any water added during the drilling process is removed.
8. Additional monitoring wells in the lower Hawthorn Group formations (intermediate aquifer) are needed to determine the vertical extent of contamination at the former south lagoon and cooling pond/process area. Construction and sampling of these wells should be combined with installation of the additional Floridan wells.

Prepared by Robin Hallbourg, P.G.