



Alachua County Environmental Protection Department

Chris Bird, Director

February 12, 2010

Mr. Scott Miller
Remedial Project Manager
USEPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: ACEPD Comments on the Koppers Comprehensive Groundwater Monitoring Sampling and Analysis Plan (CGMSAP), submitted by Field and Technical Services, September 18, 2009 for Beazer East, Inc.

Dear Scott:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the Koppers CCMSAP prepared by FTS dated September 18, 2009 for Beazer East, Inc. and would like to reiterate some of our previous comments as well as provide additional comments. The first six comments are up-dated versions of the comments we submitted December 17, 2008, after our review of the initial CCMSAP by FTS on October 13, 2008. These comments were not integrated into the revised CCMSAP submitted by FTS September 18, 2009. Comments 6 through 11 are new to this document, although conceptually many of these issues have been brought up by ACEPD in review of other documents.

1. In Section 1.1.3 of the CGMSAP there is a discussion of 82 monitoring locations in the Floridan program and that there are 75 wells sampled quarterly. These numbers do not appear to be correct, do not reference the monitoring of the multi-zone wells, and are inconsistent with Section 2.2.3 that states there are 29 Floridan monitoring wells. CGMSAP text should be revised to correctly reference the number of wells and number of monitoring zones for multi-port wells.
2. The first paragraph of Section 2.2.1 discusses future installation of the surficial aquifer horizontal well IRM and short-term monitoring to evaluate effectiveness. This text should be revised to reflect the completed installation of these systems. Selected existing or new wells in these areas should be included in the CGMSAP. ACEPD recommends adding wells downgradient of each source area to the CGMSAP.
3. The majority of surficial aquifer system wells proposed for monitoring are located along the eastern property boundary. Surficial aquifer contamination has migrated off-site to the east, beyond the property boundary. Additional surficial aquifer wells should be installed off-site to the east and monitored to assess long-term trends in surficial aquifer water quality. Naphthalene concentrations in samples obtained in August 2007 from surficial aquifer wells along the eastern property boundary M-16B (5,600 ug/L), M-17 (3,100 ug/L), M-20B (1,300 ug/L), and M-25B (6,500 ug/L) indicate that the extent of offsite contamination has not defined and cannot be adequately monitored with these existing wells.
4. The proposed list of analytes mentioned in Section 2.2.1 should be expanded, from BTEX and the "select list of semi-volatiles" to include all reportable constituents in both EPA Method 8260 and 8270, not just those constituents listed in Tables 5-3 and 5-4. There are other constituents, not currently being reported that would aid in the delineation of the groundwater plumes and contaminant movement and migration. Additionally, the proposed contaminant reporting limits for the CCMSAP should be the lower MDL and Reporting Limits that have been previously used for monitoring of the groundwater at this site and not the higher reporting limits proposed in the plan. This is also important for arsenic, where the proposed reporting limit is 10 ug/L, which is the standard. Lower levels are important in establishing trends; arsenic can easily be analyzed and reported at concentrations of less than 1 ug/L.

5. There are no lower Hawthorn Group wells in proximity to the South Lagoon or Process Area. To fully evaluate and monitor the contamination in the Lower Hawthorn Group, additional wells should be constructed and sampled to monitor groundwater quality in the Lower Hawthorn (intermediate aquifer) in the southern portions of the site.
6. ACEPD recommends the installation of an additional multi-zone well to the west of the northwest portion of the property to monitor the off-site extent of contamination detected in FW-22B. It appears likely that contaminants in proximity to FW-22B have migrated off-site. This is a residential area with both potable and irrigation wells currently in use.
7. The introduction (Section 1) does not discuss monitoring of either the Floridan aquifer low flow pumping IRM or the recently installed horizontal well system IRM for source areas. Monitoring of these two activities is ongoing or has been planned, will likely be of extended duration, and should be discussed and included in the CGMSAP.
8. ACEPD believes that the CCMSAP does not adequately monitor the surficial aquifer water quality, which is critical to assessing the effectiveness of the extraction system and the horizontal well IRM on long-term water quality. Additionally, the proposed plan ignores the present off-site surficial contamination to the east as discussed in comment 3 and contamination in proximity to source areas. Without additional on-going monitoring in the surficial, it will be difficult to monitor site-wide groundwater quality changes over time.
9. Currently, there are no Hawthorn Group wells on the northern property boundary. In Section 2.1 of the CGMSAP there is a discussion of flow in the Lower Hawthorn as being "to the northeast and the northwest with a groundwater divide running approximately north-south through the Site." This indicates a northerly component to groundwater flow. ACEPD recommends installation and monitoring of upper and lower Hawthorn Group (intermediate aquifer system) wells along the northern property boundary.
10. ACEPD does not concur with the proposed removal of chromium, discussed in Section 2.2.1, from the list of analytes. Monitoring chromium and arsenic may provide important information on the source(s) of these metals in the groundwater as it relates to former site activities.
11. ACEPD recommends analyses of unfiltered groundwater samples for all constituents, including trace metals. Historically, most analyses for trace metals have been performed on field filtered groundwater samples. ACEPD believes unfiltered samples from properly developed wells are the best indicator of groundwater quality. Unfiltered samples are required by the FDEP under their standard operating procedures.

ACEPD appreciates the opportunity to provide comment on this critical monitoring plan. If you have any questions, please contact Robin Hallbourg or me at 352-264-6800.

Sincerely,



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

Cc: Rick Hutton, GRU
John Herbert, JEA
Kelsey Helton, FDEP
Robin Hallbourg