

Alachua County Environmental Protection Department

Chris Bird, Director

September 3, 2008

Mr. Scott Miller
Remedial Project Manager
Waste Management Division
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

Re: ACEPD Comments on FS Meeting #3 Notes Summary and Related Issues , Koppers Superfund Site

Dear Mr. Miller:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the FS Meeting #3 Notes Summary and proposed FS Alternatives to be evaluated for the Koppers Superfund Site and has the following comments.

- 1) General Comment— ACEPD believes that remedial alternatives that remove, treat or otherwise reduce the mobility and mass of creosote source material or contamination contained in the Surficial, Upper Hawthorn, Lower Hawthorn and Floridan Aquifers on the Koppers site are necessary and should be the preferable remedial options for the Koppers Superfund site. ACEPD supports the conclusion that creosote in the source zones is and will continue to be mobile and pose a continuing threat to the Floridan Aquifer unless successful source treatment, removal or immobilization is implemented in each aquifer zone in the final remedy.
- 2) Floridan Aquifer – Active remediation or containment of the contaminated zones within the Floridan Aquifer under the Koppers site must be included as specific planned actions in the remedial alternatives presented for the proposed FS and not only as contingency alternatives. Active remedies may include pump and treat and chemical oxidation of contaminants in the Floridan. Active remediation of the Floridan must also be combined with appropriate aggressive actions to reduce, remove or treat contaminants in the Surficial and Hawthorn aquifers which continue to be a source of Floridan contamination. Pump and treat remedies if selected should be designed with the goal of preservation of groundwater resources in the Floridan Aquifer. Additionally, further investigation of the sources of the deeper contamination observed in FW-12B must be conducted prior to implementation of any significant pump and treat remedy in the Floridan in order to insure that more extensive contamination of the Floridan near FW-12B does not occur. See item 4 below.
- 3) Floridan Aquifer -- ACEPD supports low-flow pumping of FW-6 and FW-21B as an interim remedial measure to help define the source of the contamination and remove contaminants from the Floridan.

201 SE 2nd Avenue Suite 201 ■ Gainesville, Florida 32601 ■ Tel. (352) 264-6800 ■ Fax (352) 264-6852

Suncom 651-6800 ■ TDD (352) 491-4430

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- 4) Floridan Aquifer -- Additional assessment of the contamination in FW-12B is extremely important and needed due to the increasing contamination with depth. Monitoring plume stability (as proposed in FS alternatives 2 through 5C) will do nothing, since the source/pathway of the contaminant migration into the Floridan is unknown as this time. There is only one well, FW-12B so there is no "plume" defined. Contamination in FW-12B is greatest in the lower zones. Additional investigation is needed to determine specific interim remedial measures needed to reduce contamination, determine the vertical and horizontal extent of contamination, and provide additional information for remedial measures.
- 5) Upper Hawthorn Aquifer -- Upper Hawthorn Group (UHG) Alternatives 3A and 5A in the FS alternatives which include slurry walls (without and with passive DNAPL recovery) do not provide a mechanism for limiting migration of creosote product vertically into the Lower Hawthorn Group (LHG). ACEPD believes that migration of contamination through the Middle Hawthorn Clay layer is likely occurring. Therefore these slurry wall alternatives do not appear to be effective solutions to limiting the threat to the Floridan and Lower Hawthorn aquifers.
- 6) Lower Hawthorn Aquifer -- Additional Lower Hawthorn wells in the process area are needed to fully characterize the contamination status in this area and for selection of the appropriate remedy. Currently, there are no monitoring wells in Lower Hawthorn in the process area. The two Upper Hawthorn wells in the process area (HG-11S and HG-15S) reportedly have the greatest amounts of DNAPL of all the Upper Hawthorn wells (based on passive recovery). Nearest monitoring wells (to the northeast), HG-6S and HG-6D have naphthalene concentrations of 450 and 3,850 ug/L and benzene concentrations of 14 and 37 ug/L, respectively (for 12/11/07 and 12/12/07). HG-6D is in the LHG and ~500 feet from the former process area. There may be free product in the LHG in the former process area. As part of any remedial alternative implemented, additional intermediate aquifer (Hawthorn) wells will be needed to monitor groundwater and assess success of remedial measures. Monitoring for natural attenuation should only be implemented where the HG source materials are removed or stabilized.
- 7) Remedial Alternatives -- ISSS and ISBS cannot be fully evaluated as viable alternatives for source treatment without the completion of the pilot scale tests for these technologies.
- 8) Remedial Goals -- ACEPD agrees with FDEP that remedial goals should be established for each zone in order to evaluate the different alternatives. ACEPD supports establishing the site boundary as the point of compliance for achieving GCTLs for this site.

If you have any comments or questions about these comments, please contact me at (352) 264-6805.

Sincerely,


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

CC: Robin Hallbourg Chris Bird Rick Hutton, GRU