



Alachua County Environmental Protection Department

Chris Bird, Director

November 17, 2010

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

Re: ACEPD Comments on the GeoTrans Workplan "Field Investigation of Historical Linear Features Identified from Aerial Photographs and Potential Drum-Disposal Areas, Koppers Inc. Site, Gainesville, Florida" dated October 11, 2010.

Dear Scott:

The Alachua County Environmental Protection Department (ACEPD) has reviewed the above referenced workplan for investigation of historically disturbed features and potential drum disposal areas on the former Koppers site. ACEPD appreciates USEPA's and Beazer's willingness to further investigate this issue. Based on this review, ACEPD has the following comments:

1. Section 2.5.1 of the workplan describes the proposed investigations for potentially buried drums using GPR and EM in the several areas on site. Since the extent and locations of any potential burials is not exactly known, the screening area for the GPR and EM survey should be of sufficient size to provide increased confidence that drum burials did not occur in the screened area. ACEPD believes that the 100ft by 250ft rectangular screening area near the North Lagoon (as shown in Figure 2 of the workplan) is not large enough to adequately provide the assurance that no drum burial occurred in this area. ACEPD recommends the north-south width of the proposed screening area be made at least 200 ft in width instead of the proposed 100 ft width.
2. It is important that all potential source areas on the entire site be investigated before a final remedy is implemented. A review of historical aerial photographs (1937 to 1968) performed by the City of Gainesville (Stu Pearson) and GRU (John Herbert) has revealed what appear to be four east west trending parallel features or trenches near the former South Lagoon area. In addition an irregularly shaped pond appears to be located west of these features. (See attached Figure). While these features may be part of the former South Lagoon, they appear to be outside of the currently mapped footprint of the former South Lagoon. ACEPD recommends that additional investigation be performed in this area. This additional screening could be accomplished by expanding the size of the planned southwestern area investigation to include the area of these linear features and lagoon.
3. ACEPD also notes that no investigation for buried drums is planned for the eastern area of the site. This omission leaves a major section of the site that is uninvestigated. ACEPD recommends that some screening be performed in the eastern area of the site especially in the areas north of the Former Process Area, near the eastern boundary and towards the northeastern area of the site. Confirmatory trenching is also important in these areas, since geophysical screening techniques may have limitations due to the presence buried pipes and other metallic objects related to historical site use and infrastructure.
4. The workplan calls for a maximum depth of 8 feet or the water table for the confirmation trenches in the investigated areas. Since certain areas such the northern saw dust and bark areas may have significant depths of saw dust or bark materials buried and other areas may have been filled in with

Page 2

these or other materials, ACEPD recommends that all confirmation trenches/test pits be extended in depth beyond 8 feet if necessary until native soil is reached.

5. Section 2.5.4 of the report indicates that one shallow test pit will be installed in each of the historically disturbed areas in the northwestern area of the site. ACEPD recommends that at least two confirmation trenches in each of these disturbed areas be performed instead of just one trench to provide greater confidence in the investigation.
6. GPR as well as EM surveys should be conducted throughout the full length of the each geophysical transect line, including in the Southwest Area, since it is likely that any potential buried drums may have deteriorated over the years and thus yield an attenuated EM response relative to new drums.
7. Evaluating all of these areas using remote sensing techniques provides information that may be useful in locating abandoned or unused wells. ACEPD requests that any anomalies, which could signal the presence of a former well be investigated and that any wells located be sampled and properly plugged.

ACEPD appreciates the opportunity to comment on this workplan. Please contact me with any questions.

Sincerely,



John J. Mousa, Ph.D.

Pollution Prevention Manager

cc: Robin Hallbourg, P.G.
Rick Hutton, P.E., GRU
Fred Murry, Asst. City Manager Gainesville
Stu Pearson, P.E., Gainesville
Chris Bird, Director ACEPD
Kelsey Helton, FDEP
Mitch Brouman, Beazer East
James Erickson, P.G. GeoTrans
Greg Council, GeoTrans
John Herbert
Dean Williamson

Attachment: Aerial Photograph from 1961

ACEPD Comments on the GeoTrans Workplan "Field Investigation of Historical Linear Features Identified from Aerial Photographs and Potential Drum-Disposal Areas, Koppers Inc. Site , Gainesville, Florida" dated October 11, 2010.

Page 3

