

John Mousa

From: Erickson, Jim [Jim.Erickson@geotransinc.com]
Sent: Monday, May 10, 2010 4:04 PM
To: Hutton, Richard H; Brett P. Goodman; 'chaffins.Randall@epa.gov'; Chris Bird; Council, Greg; Helton, Kelsey; John Mousa; John Herbert; kevin koporec; Miller.Scott@epamail.epa.gov; Mitchell Brouman (mitch.brouman@hanson.biz); Osteen.Bill@epamail.epa.gov; Richard E. Jackson; Robin Hallbourg; RWCLEARY@aol.com; Stanley Feenstra; wayne_reiber@cabot-corp.com
Subject: RE: Comments on Upper FLA Extraction Well FW-31BE Performance Monitoring Workplan

Thanks Rick,

Given the short turn-around for this workplan, I thought it was best to clarify the workplan and address your comments in this email.

1) 1. In addition to the recording of water levels proposed by GeoTrans, we believe that water level should be recorded (during the 1-week constant rate test only) in wells FW-24B and FW-2.

Beazer will add two additional wells with transducers for the pumping test (FW-24B and FW-2), as suggested. In the workplan we were trying to balance the number of Westbay wells that required pumping ports to be opened versus the need for additional well data for analyzing the test.

2. Section 2.3 suggests that water levels will be recorded only once every 12 hrs. We suggest much more frequent data recording throughout the test (once every 15 minutes). GeoTrans has reported water level changes in the Floridan over the course of a single sampling day (quarterly sampling reports). And that is in the absence of any nearby pumping.

Section 2.3 is describing the long-term (6-month) water-level monitoring for wells in the vicinity of the extraction well. The transducers will be programmed to collect data based both on water-level change and on fixed time intervals (12 hrs). Hence, at a minimum there will be 2 water-level readings per day for 6 months; in addition, if water-levels change by more than approximately 0.1 ft between readings, additional water-level data will be recorded. The frequency of data collection is sufficient to evaluate the long-term water-level response in the NW corner of the site. The primary objective is to capture long-term drawdown data; however, short-term data will also be captured when water levels are changing rapidly. If water-levels are not changing significantly over a 12 hr period there is no need to collect data indicating there was no change. Trying to maximize transducer battery life and frequency for downloading data.

3. Section 2.3: GeoTrans should clearly specify much more frequent data collection at the start and finish of the test. The work plan alludes to collecting data on five second intervals if the pump fails – we assume that would apply at the start and cessation of pumping but it should be clearly stated.

Yes, the sample interval for pulsing the transducer will be approximately every 5 secs or less (1 sec excitation interval for FW-31BE to make sure we capture rapid drawdown in pumping well). Water-level data will be recorded based on: 1) If water levels change by more than approximately 0.1 ft in between readings, then the data will be captured and stored; and 2) A fixed time interval of 5-15 minutes; if water levels are not changing, there is no need to record data every 5 secs. The basic

concept is that we collect sufficient data to accurately capture drawdown and recovery of water levels required for analytical analyses; hence lots of data during start of test and start of recovery, and less data as time into test increases.

4. Regarding detection/reporting limits – we believe the low detection limits historically achieved at the Koppers Site are necessary. See comments to the CGMSAP by GRU, FDEP, ACEPD, and USEPA relative to detection and reporting limits. We believe the historically low detection/reporting limits should be met by all analyses conducted at the Cabot Carbon – Koppers Superfund Site. Specifically - The tables in the “Upper Floridan Aquifer Extraction Well FW-31BE Performance Monitoring Workplan; Koppers Inc. Site, Gainesville, Florida” suggest that concentrations below the MRL but above the MDL will be reported as "J" values only if they are at, or exceed the GCTL. This is not acceptable because no "J" values would be ever reported except for 3-&4-methyl phenol and carbazole who's MRL are less than the GCTL. Most critically on the northwest corner of the site where acenaphthene is a key indicator of off-site migration pathways for Koppers contaminants, no values below the MRL of 5 µg/L would ever be reported because they would not exceed the GCTL.

The sampling procedures and laboratory reporting limits will be consistent with the final CGMSAP.

We will be reporting the Practical Quantitative Limit (PQL), which is the lowest concentration that the lab can reliably report for a specific analyte and analysis method.

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Sent: Monday, May 10, 2010 10:48 AM

To: Brett P. Goodman; 'chaffins.Randall@epa.gov'; Chris Bird (Chris@alachuacounty.us); Council, Greg; Helton, Kelsey; Erickson, Jim; JJM@alachua.fl.us; John Herbert; kevin koporec; Miller.Scott@epamail.epa.gov; Mitchell Brouman (mitch.brouman@hanson.biz); Osteen.Bill@epamail.epa.gov; Richard E. Jackson; Robin Hallbourg; RWCLEARY@aol.com; Stanley Feenstra; wayne_reiber@cabot-corp.com

Subject: Comments on Upper FLA Extraction Well FW-31BE Performance Monitoring Workplan

Scott,

Attached are GRU's comments to the Upper FLA Extraction Well FW-31BE Performance Monitoring Workplan – Koppers Gainesville (April 28, 2010).

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