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August 20, 2015

Mr. Scott Miller
Regional Project Manger
United States Environmental Protection Agency
Region 4
61 Forsyth Street
Atlanta, Georgia 30303

Dear Scott:

This is in response to your letter dated July 22, 2015 requesting a work plan detailing milestones necessary to complete groundwater remediation of the Hawthorn Group (HG) formation on the Cabot portion of the Cabot/Koppers Superfund Site (Site) in Gainesville, Florida. This letter presents the key milestones necessary to complete the ongoing characterization of the HG formation and Floridan aquifer at the Site, and develop an effective remedial strategy. A schedule to complete these activities is also attached (Attachment 1).

Over the past four years, Cabot has successfully completed multiple investigations of the HG formation on the Cabot portion of the Site with dual objectives of source characterization and plume delineation. A supplemental HG investigation, which consists of an investigation in the Former Processing and Storage Area, and installation of permanent monitoring wells in the HG formation and Floridan Aquifer, is ongoing. The installation of 8 permanent Hawthorn Group monitoring wells and the process area borings has been completed. As discussed below, Cabot will complete this investigation and consider all of the investigation results as part of the remedial alternatives analysis for the Cabot portion of the Site.

The specific milestones that are necessary to the remedial evaluation and selection process for the Site are discussed below. An implementation schedule is presented as Attachment 1.

- ***Installation of Upper Floridan Monitoring Well:*** A monitoring well will be installed in the Upper Transmissive Zone of the Upper Floridan Aquifer as specified in the work plan approved by USEPA (Gradient and Weston, 2014). The installation of the well, which has been delayed due to serious mechanical problems with the drill rig, is expected to begin in the third week of September. Weston will submit to EPA a revised HG Investigation Implementation Schedule when the remobilization date is confirmed. As detailed in Weston's Implementation Schedule, the estimated duration of the well



installation work, including installation and testing of the multiport system, is expected to take approximately 9 weeks.

- **Groundwater Sampling Events:** Two rounds of groundwater sampling will be conducted during this investigation, as specified in the work plan. However, to advance the Supplemental Remedial Investigation/Focused Feasibility Study (SRI/FFS), the schedule for the first round of groundwater samples from the HG wells will be moved forward to September and the samples will be collected from the new and existing HG wells prior to the installation of the Floridan Well. The 2nd subsequent round of groundwater samples will be collected from the HG and Floridan monitoring wells approximately three weeks after the Floridan monitoring well has been installed, *i.e.*, in early December. Samples will be analyzed by the laboratory with a standard turnaround of two weeks followed by a data validation period of two weeks.
- **Focused Feasibility Study:** Cabot will submit to EPA by December 4, 2015 a Technical Memorandum that presents the available HG Investigation results and discusses viable remedial options for the Cabot portion of the Site. Cabot then proposes to meet with USEPA the week of December 7th to review and discuss the preliminary findings contained in the Technical Memorandum. In particular, Cabot will present a conceptual framework for the Focused Feasibility Study (FFS) report, including a matrix of the combination of viable remedial alternatives for the Cabot portion of the Site, and an evaluation of these alternatives against the nine CERCLA RI/FS criteria. Cabot will use the feedback obtained during the meeting to further refine the remedial strategy for the Site and finalize the FFS report.
- **Submittal of Supplemental Remedial Investigation/Focused Feasibility Study (SRI/FFS) Report:** Cabot will prepare a SRI/FFS report, which will include a discussion of the all the HG and Floridan Aquifer characterization dataset, and an analysis of remedial alternatives. Cabot will submit a draft of the SRI/FFS report to USEPA 3 months following the receipt of the complete analytical data package from the laboratory (*i.e.*, for both groundwater sampling events).
- **Monthly Progress Reports:** Weston has been providing USEPA and the Stakeholders with weekly progress reports during implementation of the work plan and will continue to do so when they remobilize for the installation and development of the Floridan Well. In addition, Cabot will provide updates regarding the status of the field investigation and SRI/FFS work in monthly progress reports, which will be submitted to USEPA by the 10th of each month.



We look forward to working with USEPA to ensure the successful implementation of this program. Please feel free to call if you questions or need additional information.

Sincerely,

Cabot Corporation

A handwritten signature in black ink, appearing to read "Wayne Reiber". The signature is fluid and cursive, with a long horizontal line extending to the right.

Wayne Reiber
Manager, Environmental Assessment and Remediation

**Attachment 1
Proposed SRI/FFS Schedule**

| Activity | September 9/1/2015 | October 10/1/2015 | November 11/1/2015 | December 12/1/2015 | January 1/1/2016 | February 2/1/2016 | March 3/1/2016 | April 4/1/2016 |
|---|-----------------------|----------------------|-----------------------|-----------------------|---------------------|----------------------|-------------------|-------------------|
| 1 Field Work | | | | | | | | |
| 1.1 Floridan Well /Multiport Sampling System Installation, Testing, and Development | | | | | | | | |
| 1.2 Groundwater Sampling Event - Round 1 (Hawthorn Group wells only) | | | | | | | | |
| 1.3 Groundwater Sampling Event - Round 2 (Floridan and Hawthorn Group wells) | | | | | | | | |
| 2 Data Analysis and Reporting | | | | | | | | |
| 2.1 Receipt of Round 1 Validated Laboratory Data Package | | | | | | | | |
| 2.2 Receipt of Round 2 Validated Laboratory Data Package | | | | | | | | |
| 3 Supplemental Remedial Investigation/Focused Feasibility Study Report | | | | | | | | |
| 3.1 Focused Feasibility Study Meeting with USEPA | | | | | | | | |
| 3.2 Submittal of Draft SRI/FFS Report to USEPA | | | | | | | | |

Note: This sequential schedule assumes that Floridan well FW-1 installation begins on September 21, 2015. If the start date for the well installation is delayed, there will be a corresponding delay in the milestones outlined in the schedule.