



October 8, 2015

Rusty Kestle  
Remedial Project Manager  
Superfund Remedial Branch, Section C  
U.S. Environmental Protection Agency, Region 4  
61 Forsyth Street SW  
Atlanta, GA 30303-8909

**VIA EMAIL**

Subject: **September 2015 Monthly Progress Report**

Dear Mr. Kestle :

On behalf of Beazer East, Inc. (Beazer), attached is the September 2015 Monthly Progress Report for the Koppers portion of the Cabot/Koppers Superfund Site in Gainesville, Florida. If you have any questions or comments, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gregory W. Council'.

Gregory W. Council, P.E.  
Principal Engineer

cc: Kelsey Helton, FDEP  
Robin Hallbourg, ACEPD  
Agustin (Gus) Olmos, ACEPD  
Kristie Williams, City of Gainesville  
Yvette Carter, City of Gainesville  
Rick Hutton, GRU  
Carrie McCoy, Black & Veatch  
Josh Hayes, J.M. Waller  
John Herbert, GeoHydro Consultants  
Patricia Cline, Community Technical Advisor  
Linda Paul, Koppers, Inc.  
Mitchell Brouman, TRMI  
Mike Slenska, TRMI  
Donna Kopach, TRMI  
Jim Erickson, Tetra Tech  
Wayne Reiber, Cabot Corporation  
Steve Clark, FTS  
John Helton, FTS

**September 2015  
MONTHLY PROGRESS REPORT  
Cabot/Koppers Superfund Site  
Gainesville, Florida**

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**1. Compliance Actions:**

- Beazer's Operation and Maintenance (O&M) Contractor performed routine treatment plant O&M services for the groundwater extraction and pretreatment system.
- Remedial Design and Remedial Action activities are presently being conducted.

**2. Sampling/Test Results and Data:**

- Instantaneous flow rates and totalizer volumes were measured in each extraction well.
- Note that ISGS injections affect the NAPL recovery amounts presented below. See Section 3 and Tables 1 and 2.
- The bi-weekly passive NAPL recovery program continues at Upper Hawthorn monitoring wells: 0.6 gallons of NAPL were removed from Upper Hawthorn wells during the past month (2 recovery events). Note that no recovery was conducted at HG-11S and HD-15S due to the ISGS operations. A total of 598.71 gallons have been removed since the start of the NAPL recovery program on June 19, 2004. Table 1 provides details of the NAPL recovery volumes by well and date.
- In addition, NAPL was removed from the temporary injection point (TIP) installed in the Former Drip Track Area (Table 2). Two NAPL recovery events were conducted during the month, resulting in a total of 0.6 gallons removed. Note that NAPL was not collected from the remainder of the TIPs due to ISGS operations in the Former Process Area.
- NAPL was not removed from five Upper Hawthorn recovery wells installed in the Former Process Area as part of the ISGS program due to the active ISGS operations.
- A total of 3,659,990 gallons of groundwater were recovered by the Surficial Aquifer drains and extraction well system (both Surficial Aquifer and UFA) during the past month (system run time of 720 hours). The average recovery rate for the month was approximately 84.72 gallons per minute (gpm). The recovery for each component is listed below.
  - Surficial Aquifer
    - Perimeter Extraction Wells: 647,049 gallons
    - Former North Lagoon Drain: 445,850 gallons (estimated from 9/1-9/8/15)
    - Former Drip Track Drain: 505,270 gallons
    - Former Process Area Drain: 0 gallons (Inactive due to ISGS operations)
    - Former South Lagoon Drain: 415,080 gallons
  - Upper Floridan Extraction Wells
    - FW-6: 28,170 gallons
    - FW-21B: 167,908 gallons
    - FW-31BE: 951,990 gallons
    - FW-32BE: 498,673 gallons

Approximately 368.8 million gallons have been recovered from the Surficial Aquifer extraction wells and four drains since the start of the Surficial Aquifer containment system in January 1995.

For the month, the total volume of water treated and discharged to the GRU wastewater system was 2,015,000 gallons. The remaining portion of the water, from Upper Floridan Aquifer wells, was treated and used for on-Property irrigation.

The Former South Lagoon groundwater drain pumps were turned off for approximately 4 hours to pump and clean clarifiers and to treat backwash water. The Process Area pumps were turned off on July 13, 2015 at the start of the ISGS injection.

**3. Plans, Reports, Deliverables and Procedures Completed:**

- ISGS injection started on July 9, 2015 and were completed on September 23, 2015.
- Letter regarding “*Field Test of Organoclay Addition to ISGS Injectate*” was submitted September 15, 2015.
- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) September 15, 2015.
- Design Track 2 pre-design investigation field tasks began September 28, 2015.
- Periodic maintenance checks and inspections.
- Treatment-plant component maintenance and repair as needed (caustic pump, carbon vessel gaskets and gauges, sludge pump diverter valve, bag filter vessel).
- Replaced translator on North Lagoon flow meter (was inoperable from Aug 27, 2015 to Sept 9, 2015).
- Irrigation Breakthrough and TSE sampling on Sept 9, 2015.
- Stormwater Sampling on Sept 16-17, 2015.
- On-property irrigation using treated groundwater from FW-6, FW-21B, FW-31BE, and FW-32BE.

**4. Upcoming Actions:**

- NAPL collection at Upper Hawthorn monitoring wells: bi-weekly, except in active ISGS areas.
- NAPL collection at temporary Upper Hawthorn ISGS injection points: bi-weekly, with modifications during ISGS injections.
- Routine inspection, operation, maintenance, and monitoring.
- Third quarter sampling event: November 30 - December 4, 2015.

**5. Schedule Status:**

- The current remedial design schedule is attached.

**6. Plan/Schedule Modifications:**

- Minor modifications were made to the project schedule.

**7. Community Involvement:**

- Future community involvement activities will be coordinated with EPA.

**Table 1. DNAPL Recovery - Hawthorn Group Monitoring Wells**

Well ID	Total Last Month (gal) (2 events) August 2015	DNAPL Volume (gal) 9/3/2015	DNAPL Volume (gal) 9/17/2015	Total This Month (gal) September 2015
HG-9S	0	Stain	Stain	0
HG-10S	0	Stain	Stain	0
HG-10D	0	Stain	Stain	0
HG-11S	0	*	*	0
HG-12S	0.6	0.3	0.3	0.6
HG-12D	0	ND	ND	0
HG-15S	0	*	*	0
HG-16S	0.15	Stain	Stain	0
HG-16D	0	Stain	Stain	0
MW-22B	0	Stain	Stain	0
Total	0.75	0.3	0.3	0.6
Cumulative Total	598.11			598.71

ND - No DNAPL Detected

\* Not collected due to active ISGS injections in the area.

**Table 2. DNAPL Recovery Temporary Injection Points (TIPs)**

Well ID	Total Last Month (gal) (2 events) August 2015	DNAPL Volume (gal) 9/9/2015	DNAPL Volume (gal) 9/23/2015	Total This Month (gal) September 2015
220N/180E	2.3	*	*	0
280N/380E	0	*	*	0
300N/180E	0	*	*	0
300N/420E	0	*	*	0
320N/220E	0	*	*	0
320N/300E	0	*	*	0
340N/340E	0	*	*	0
360N/280E	0	*	*	0
380N/340E	0	*	*	0
400N/380E	0	*	*	0
460N/340E	0	*	*	0
420N/345E	0	*	*	0
220N/340E	0	*	*	0
240N/380E	0	*	*	0
340N/180E	0	*	*	0
320N/140E	0	*	*	0
300N/260E	0	*	*	0
360N/140E	0	*	*	0
400N/140E	0	*	*	0
200N/220E	0.9	*	*	0
280N/220E	0	*	*	0
360N/220E	0	*	*	0
280N/300E	0	*	*	0
360N/380E	0	*	*	0
507N/260E	0	*	*	0
Drip Track	0.5	0.3	0.3	0.6
Total	3.7			0.6

NP - Not Pumped

\* Not collected due to active ISGS injections in the area.

GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	Timeline																											
							2013	2014	2015	2016	2017	2018																						
							Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4							
1		<b>1 Consent Decree for RD/RA</b>	<b>23.8 wks</b>		<b>Thu 2/7/13</b>	<b>Wed 7/24/13</b>																												
2	1.1	US DOJ Lodges Donsent Decree with Court	0 days		Thu 2/7/13	Thu 2/7/13																												
3	1.2	Public Comment on Consent Decree	4.6 wks		Wed 2/13/13	Fri 3/15/13																												
4	1.3	Beazer Submittal: Project Coordinators, Supervising Contractor, Quality Management Plan	0 days		Fri 2/15/13	Fri 2/15/13																												
5	1.4	Court Enters Consent Decree Final	0 days		Tue 7/9/13	Tue 7/9/13																												
6	1.5	EPA Issues Authorization to Proceed with Remedial Design	0 days		Wed 7/24/13	Wed 7/24/13																												
7																																		
8		<b>2 Remedial Design Work Plan (RDWP)</b>	<b>22.3 wks</b>		<b>Wed 7/24/13</b>	<b>Thu 12/26/13</b>																												
9	2.1	Prepare RDWP	43 days	6	Wed 7/24/13	Fri 9/20/13																												
10	2.2	Beazer Submit RDWP	0 wks	9	Fri 9/20/13	Fri 9/20/13																												
11	2.3	EPA Review and Comment RDWP	6.8 wks	10	Mon 9/23/13	Thu 11/7/13																												
12	2.4	Beazer Respond to Comments	4.3 wks	11	Fri 11/8/13	Mon 12/9/13																												
13	2.5	Beazer Submit Responses and RDWP Version 2	0 wks	12	Mon 12/9/13	Mon 12/9/13																												
14	2.6	EPA Review	2.6 wks	13	Mon 12/9/13	Thu 12/26/13																												
15	2.7	EPA Approval RDWP	0 wks	14	Thu 12/26/13	Thu 12/26/13																												
16																																		
17		<b>3 Supporting Plans for RD/RA</b>	<b>100.8 wks</b>		<b>Fri 9/20/13</b>	<b>Thu 8/27/15</b>																												
18	3.5	Beazer Submit Health & Safety Plan	0 wks	10	Fri 9/20/13	Fri 9/20/13																												
19	3.2	Materials Management Plan	5 wks	10	Tue 4/1/14	Mon 5/5/14																												
20	3.6	Stormwater Management Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14																												
21	3.7	Noise and Dust Control Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14																												
22	3.5	Equipment Decontamination Plan	5 wks	19FF	Tue 4/1/14	Mon 5/5/14																												
23	3.6	Beazer update QAPP	33.8 wks		Mon 1/5/15	Thu 8/27/15																												
24	3.7	Beazer Submit Revised QAPP	0 wks	23	Thu 8/27/15	Thu 8/27/15																												
25																																		
26		<b>4 Off-Property Soil Replacement (OU-5): DESIGN TRACK #1</b>	<b>121.4 wks</b>		<b>Tue 4/30/13</b>	<b>Thu 8/27/15</b>																												
27	4.1	Initial Identification of Remediation & Evaluation Parcels	0 wks		Tue 4/30/13	Tue 4/30/13																												
28	4.2	Obtain Access Agreements for Surveys & Sampling	23 wks		Thu 5/2/13	Wed 10/9/13																												
29	4.3	Community Information Session	0 wks		Thu 5/30/13	Thu 5/30/13																												
30	<b>4.4</b>	<b>Sampling for Refinement of Remediation Parcels (July 2013)</b>	<b>18.8 wks</b>		<b>Fri 7/19/13</b>	<b>Wed 11/27/13</b>																												
31	4.4.1	Proposal for Sampling (July 2013)	0 wks		Fri 7/19/13	Fri 7/19/13																												
32	4.4.2	EPA Approval of Sampling	0 wks		Mon 7/22/13	Mon 7/22/13																												
33	4.4.3	Sample Collection	2 days		Tue 7/30/13	Wed 7/31/13																												
34	4.4.4	Analysis and Validation	6.2 wks	33	Thu 8/1/13	Thu 9/12/13																												
35	4.4.5	Data Summary Report	10.8 wks	34	Fri 9/13/13	Wed 11/27/13																												
36	4.4.6	Beazer Submit Data Summary and Fingerprinting Report	0 wks	35	Wed 11/27/13	Wed 11/27/13																												
37	<b>4.5</b>	<b>Pilot Home Soil Replacement</b>	<b>10.3 wks</b>		<b>Thu 9/26/13</b>	<b>Fri 12/6/13</b>																												
38	4.5.1	Survey	1.8 wks		Thu 9/26/13	Tue 10/8/13																												
39	4.5.2	Design & Interview	3 wks	38	Wed 10/9/13	Tue 10/29/13																												
40	4.5.3	Borrow Sampling	2 wks		Thu 10/10/13	Wed 10/23/13																												
41	4.5.4	Sample Analysis	2 wks	40	Thu 10/24/13	Wed 11/6/13																												
42	4.5.5	Pilot Plan	6 wks		Thu 9/26/13	Wed 11/6/13																												
43	4.5.6	Submit Pilot Plan	0 wks	42,41	Wed 11/6/13	Wed 11/6/13																												
44	4.5.7	Review	1 wk	43	Thu 11/7/13	Wed 11/13/13																												
45	4.5.8	EPA Approval of Pilot Plan	0 wks	44	Wed 11/13/13	Wed 11/13/13																												
46	4.5.9	Permitting	2 wks	45FF	Thu 10/31/13	Wed 11/13/13																												
47	4.5.10	Pilot Implementation	3.3 wks	46,45	Thu 11/14/13	Fri 12/6/13																												
48	<b>4.6</b>	<b>Blocks A-I Remediation Design</b>	<b>42.4 wks</b>		<b>Mon 9/16/13</b>	<b>Tue 7/8/14</b>																												
49	4.6.1	Remedial Design Details	12.4 wks	35	Thu 11/28/13	Fri 2/21/14																												
50	4.6.2	Submit RD Details	0 wks	49	Fri 2/21/14	Fri 2/21/14																												
51	4.6.3	Review and Comment	0.8 wks	50	Mon 2/24/14	Thu 2/27/14																												
52	4.6.4	Surveying & Interviews	34 wks		Mon 9/16/13	Fri 5/9/14																												
53	4.6.5	Parcel Designs & Remediation Agreements	28 wks		Mon 12/2/13	Fri 6/13/14																												
54	<b>4.6.6</b>	<b>Final Design and RAWP</b>	<b>19.6 wks</b>		<b>Fri 2/21/14</b>	<b>Tue 7/8/14</b>																												
55	4.6.6.1	Submit Pre-Final Designs & RAWP: Blocks G & H	0 wks		Fri 2/21/14	Fri 2/21/14																												
56	4.6.6.2	Final Design and RAWP Approval: Blocks G-H	1 wk	55	Fri 2/21/14	Thu 2/27/14																												
57	4.6.6.3	Submit Pre-Final Designs & RAWP: Blocks E&F	0 wks		Fri 3/7/14	Fri 3/7/14																												
58	4.6.6.4	Final Design and RAWP Approval: Blocks E&F	1 day	57	Fri 3/7/14	Fri 3/7/14																												
59	4.6.6.5	Submit Pre-Final Designs & RAWP: Block D	0 wks		Thu 4/3/14	Thu 4/3/14																												
60	4.6.6.6	Final Design and RAWP Approval: Block D	2 days	59	Thu 4/3/14	Fri 4/4/14																												
61	4.6.6.7	Submit Pre-Final Designs & RAWP: Block C	0 wks	59FF+4 wks	Wed 4/30/14	Wed 4/30/14																												
62	4.6.6.8	Final Design and RAWP Approval: Block C	0 wks	61	Wed 4/30/14	Wed 4/30/14																												
63	4.6.6.9	Submit Pre-Final Designs & RAWP: Block B	0 wks	61FF+3.1 wk	Thu 5/22/14	Thu 5/22/14																												

Red text used for current tasks

Task Milestone Summary







GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	2013				2014				2015				2016				2017				2018			
							Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3	Qtr 4	Qtr 1	Qtr 2	Qtr 3
192	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13																								
193	9.2	Submit ICIAP	0 wks	192	Fri 8/23/13	Fri 8/23/13																								
194	9.3	Review	12.5 wks	193	Mon 8/26/13	Wed 11/20/13																								
195	9.4	Beazer Respond to Comments	33 wks	194	Mon 4/6/15	Fri 11/20/15																								
196	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	195	Fri 11/20/15	Fri 11/20/15																								
197	9.6	Review	3 wks	196	Mon 11/23/15	Fri 12/11/15																								
198	9.7	EPA and FDEP Approval of ICIAP	0 wks	197	Fri 12/11/15	Fri 12/11/15																								
199	9.8	Implement Beazer-Property Restrictive Covenant	47 wks		Mon 12/14/15	Fri 11/4/16																								
200	9.8.1	Draft Proprietary Controls Package	13 wks	198	Mon 12/14/15	Fri 3/11/16																								
201	9.8.2	Submit Draft Proprietary Controls Package	0 wks	200	Fri 3/11/16	Fri 3/11/16																								
202	9.8.3	Review and Updating	8 wks	201	Mon 3/14/16	Fri 5/6/16																								
203	9.8.4	Update Title Search and Prepare Public Notice	8 wks	202	Mon 5/9/16	Fri 7/1/16																								
204	9.8.5	Beazer Publish Public Notice	0 wks	203	Fri 7/1/16	Fri 7/1/16																								
205	9.8.6	Public Comment Period	4.4 wks	204	Mon 7/4/16	Tue 8/2/16																								
206	9.8.7	Address Comments and Execute Restrictive Covenant	5 wks	205	Wed 8/3/16	Tue 9/6/16																								
207	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	206	Tue 9/6/16	Tue 9/6/16																								
208	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	207	Wed 9/7/16	Fri 11/4/16																								
209	9.8.10	Submit Final Proprietary Controls Package	0 wks	208	Fri 11/4/16	Fri 11/4/16																								