

December 10, 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: November 2015 Monthly Progress Report

Dear Mr. Kestle:

On behalf of Beazer East, Inc. (Beazer), attached is the November 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,

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 Brourman, TRMI

Mike Slenska, TRMI

Donna Kopach, TRMI

Jim Erickson, Tetra Tech

Wayne Reiber, Cabot Corporation

Steve Clark, FTS

John Helton, FTS

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

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.
- NAPL recovery was restarted in the Process Area in November following ISGS injections. The data are currently being analyzed and will be transmitted separately.
- A total of 4,141,678 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 95.9 gallons per minute (gpm). The recovery for each component is listed below.
 - Surficial Aquifer
 - Perimeter Extraction Wells: 602,091 gallons
 - Former North Lagoon Drain: 422,570 gallons
 - Former Drip Track Drain: 515,840gallons
 - Former Process Area Drain: 487,140 gallons
 - Former South Lagoon Drain: 470,870 gallons
 - Upper Floridan Extraction Wells
 - FW-6: 25,488 gallons
 - FW-21B: 47,080 gallons
 - FW-31BE: 1,005,440 gallons
 - FW-32BE: 544,999 gallons

Approximately 373.7 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 measured to be 2,502,000 gallons. A portion of the water, from Upper Floridan Aquifer wells, was treated and used for on-Property irrigation. An investigation of the totalizer and the individual well flowmeters did not produce a reason for why the October total to GRU did not correlate well with the individual flowmeters. It is possible the totalizer was briefly offline, but now appears to be functioning.

• The Former South Lagoon groundwater drain pumps were turned off for approximately 8 hours to pump and clean clarifiers and to treat backwash water. On November 25, 2015 the Former South Lagoon flowmeter was found to be inoperable, an average value was assumed. The pump at FW-21B became inoperable on Oct 19, 2015. The pump and piping was successfully removed and replaced with a new pump and piping on November 20, 2015.

3. Plans, Reports, Deliverables and Procedures Completed:

- Installed borings and collected samples for geotechnical testing in accordance with the *Pre-Design Investigation Work Plan- Design Track 2*. Work completed on November 18, 2015.
- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) November 17, 2015.
- Soil Sampling at the Material Storage Yard from November 11-18, 2015. Sediment sampling in the drainage way at the Material Storage Yard was delayed until December 10, 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).
- Irrigation Breakthrough sampling on November 23, 2015.
- Stormwater Sampling on November 18 and 19, 2015.
- Repaired EW-8 flowmeter.
- Shocked EW-16.
- Cleaned flow meter for EW-16.
- Replaced EW-9 pump.
- Repaired clarifier sludge pump, carbon vessel A and MMFB scaffolding in treatments system.
 Removed pump and piping at FW-21B and installed a new pump.
- Shipped 50 drums PPE on November 30, 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.
- NAPL collection at temporary Upper Hawthorn ISGS injection points: bi-weekly.
- NAPL collection in Process Area: bi-weekly.
- 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:

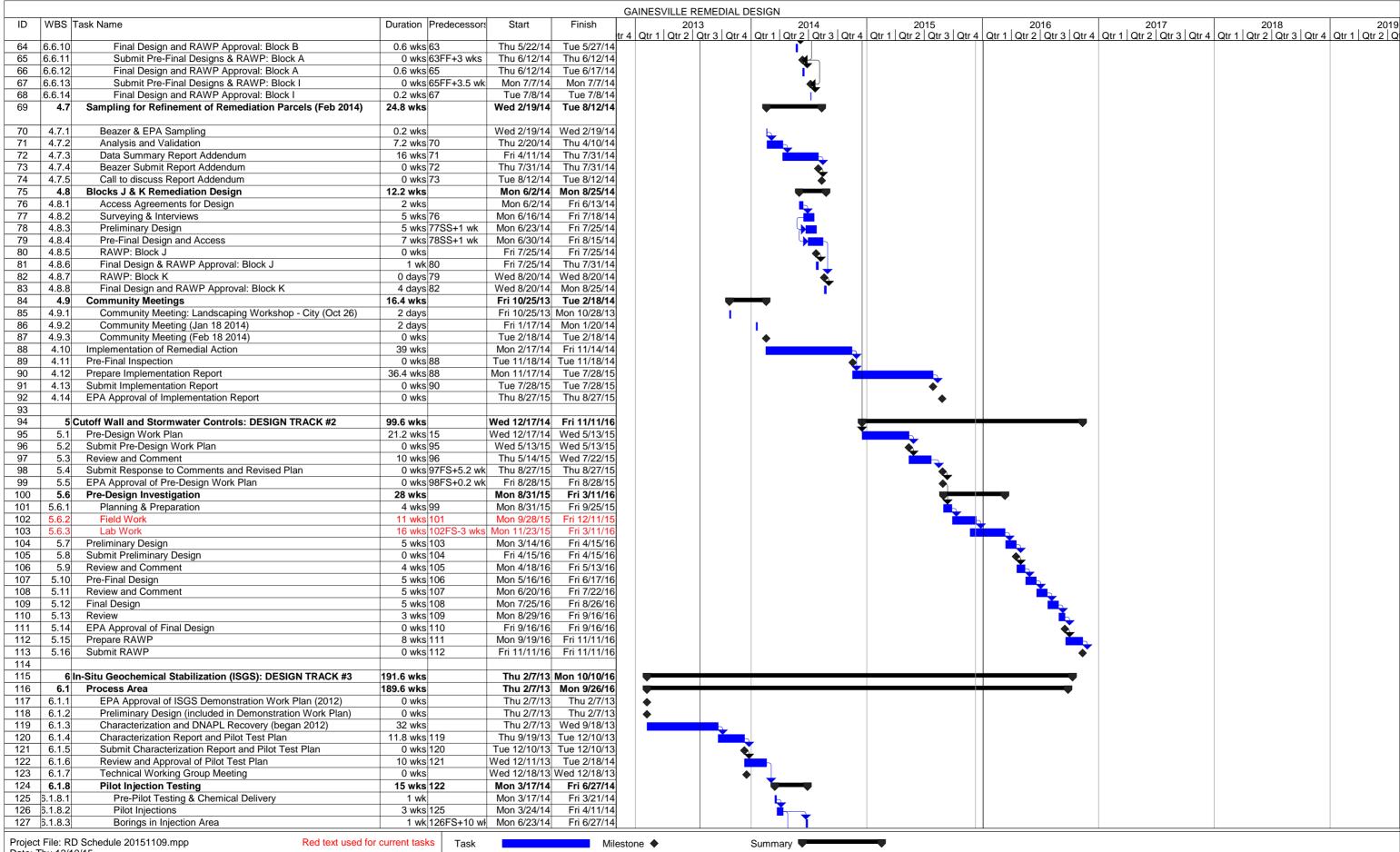
• Minor modifications were made to the project schedule.

7. Community Involvement:

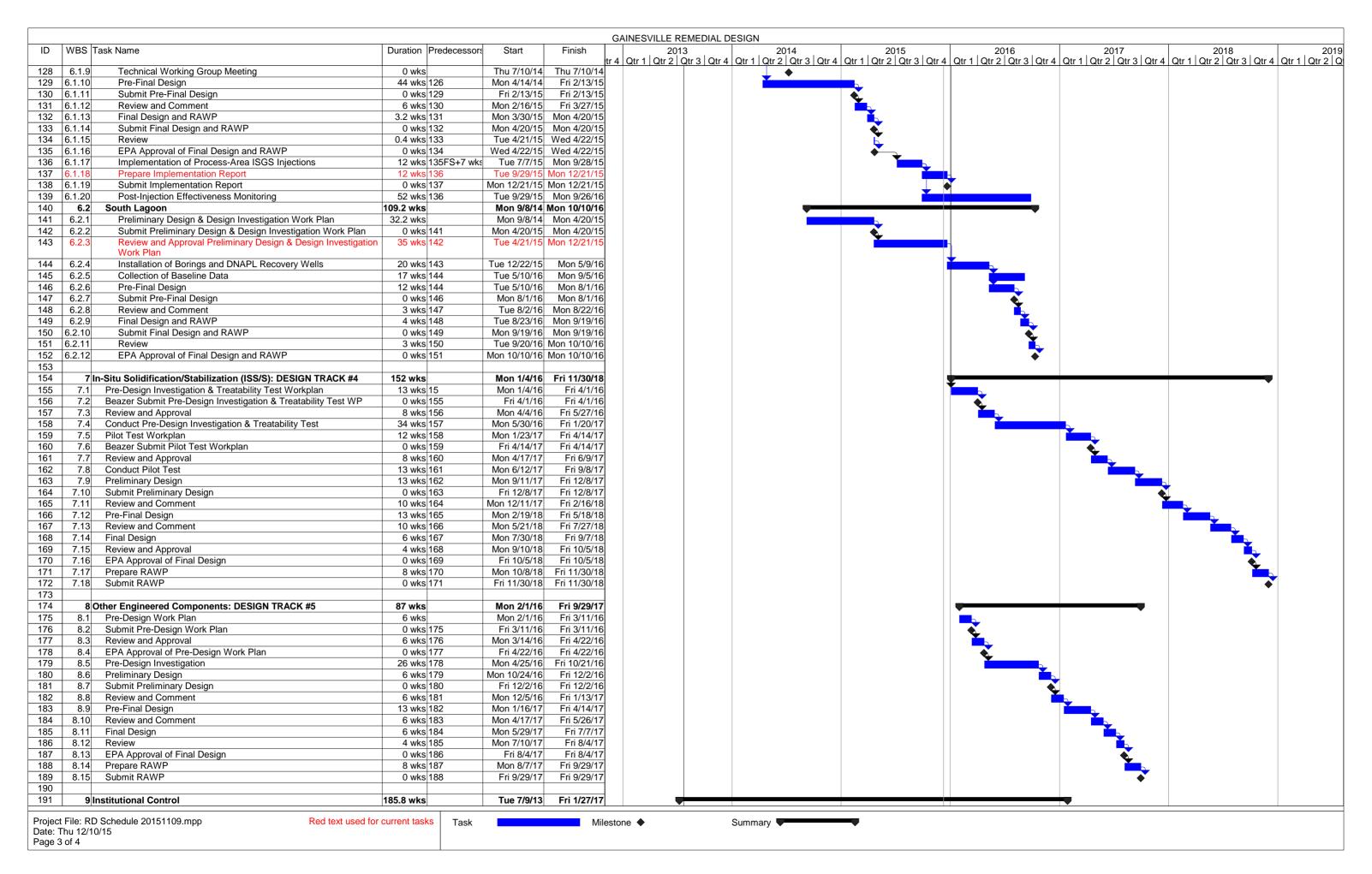
Future community involvement activities will be coordinated with EPA.

							GAINESVILLE REMEDIAL DESIGN
ID WE	BS Tasl	k Name	Duration P	redecessors	Start	Finish	2013 2014 2015 2016 2017 2017 2018 tr 4 Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qtr 3 Qtr 4 Qtr 1 Qtr 2 Qtr 3 Qtr 4 Qt
1	1 Con	nsent Decree for RD/RA	23.8 wks		Thu 2/7/13	Wed 7/24/1	
2		JS DOJ Lodges Donsent Decree with Court	0 days		Thu 2/7/13	Thu 2/7/1	
		Public Comment on Consent Decree	4.6 wks		Wed 2/13/13		
		Beazer Submittal: Project Coordinators, Supervising Contractor, Quality Management Plan	0 days		Fri 2/15/13		
		Court Enters Consent Decree Final	0 days		Tue 7/9/13		
·		EPA Issues Authorization to Proceed with Remedial Design	0 days		Wed 7/24/13		
3		nedial Design Work Plan (RDWP) Prepare RDWP	22.3 wks		Wed 7/24/13 Wed 7/24/13		
		Beazer Submit RDWP	43 days 6 0 wks 9		Fri 9/20/13		
		EPA Review and Comment RDWP	6.8 wks 1		Mon 9/23/13		
	-	Beazer Respond to Comments	4.3 wks 1			Mon 12/9/1	
3	2.5 E	Beazer Submit Responses and RDWP Version 2	0 wks 1	2	Mon 12/9/13	Mon 12/9/1	9/13
		EPA Review	2.6 wks 1		Mon 12/9/13		
	2.7 E	EPA Approval RDWP	0 wks 1	4	Thu 12/26/13	Thu 12/26/1	<u>8/13</u>
6	- 0	C DI C DD/DA	4000		E : 0/00/40	TI 0/07/	
17		porting Plans for RD/RA	100.8 wks	_	Fri 9/20/13		
		Beazer Submit Health & Safety Plan Materials Management Plan	0 wks 1 5 wks 1		Fri 9/20/13 Tue 4/1/14		
		Stormwater Management Plan	5 wks 1		Tue 4/1/14 Tue 4/1/14		
		Noise and Dust Control Plan	5 wks 1		Tue 4/1/14		
		Equipment Decontamination Plan	5 wks 1		Tue 4/1/14		
		Beazer update QAPP	33.8 wks		Mon 1/5/15	Thu 8/27/1	
	3.7 E	Beazer Submit Revised QAPP	0 wks 2	3	Thu 8/27/15	Thu 8/27/1	7/15
5							
26		Property Soil Replacement (OU-5): DESIGN TRACK #1	121.4 wks		Tue 4/30/13		
		nitial Identification of Remediation & Evaluation Parcels	0 wks		Tue 4/30/13		
		Obtain Access Agreements for Surveys & Sampling Community Information Session	23 wks 0 wks		Thu 5/2/13 Thu 5/30/13	Wed 10/9/1	
_		Sampling for Refinement of Remediation Parcels (July 2013)	18.8 wks			Wed 11/27/1	
31 4.	4.1	Proposal for Sampling (July 2013)	0 wks		Fri 7/19/13	Fri 7/19/1	9/13
	4.2	EPA Approval of Sampling	0 wks		Mon 7/22/13	Mon 7/22/1	2/13
	4.3	Sample Collection	2 days		Tue 7/30/13		
	4.4	Analysis and Validation	6.2 wks 3			Thu 9/12/1	
	4.5	Data Summary Report Beazer Submit Data Summary and Fingerprinting Report	10.8 wks 3		Fri 9/13/13 Wed 11/27/13	Wed 11/27/1	
	4.6 4.5 P	Pilot Home Soil Replacement	0 wks 3	5	Thu 9/26/13		
88 4.		Survey	1.8 wks		Thu 9/26/13		
	5.2	Design & Interview	3 wks 3	8	Wed 10/9/13		
	5.3	Borrow Sampling	2 wks		Thu 10/10/13		
1 4.	5.4	Sample Analysis	2 wks 4	.0	Thu 10/24/13		
	5.5	Pilot Plan	6 wks		Thu 9/26/13		
	5.6	Submit Pilot Plan	0 wks 4		Wed 11/6/13		
	5.7	Review EPA Approval of Pilot Plan	1 wk 4 0 wks 4		Thu 11/7/13		
	.5.8 .5.9	Permitting	2 wks 4		Wed 11/13/13 Thu 10/31/13		
7 4.5		Pilot Implementation	3.3 wks 4		Thu 10/31/13		
		Blocks A-I Remediation Design	42.4 wks	5,15	Mon 9/16/13		
9 4.		Remedial Design Details	12.4 wks 3	5	Thu 11/28/13		
0 4.	6.2	Submit RD Details	0 wks 4	.9	Fri 2/21/14	Fri 2/21/1	1/14
	6.3	Review and Comment	0.8 wks 5	0	Mon 2/24/14		
	6.4	Surveying & Interviews	34 wks		Mon 9/16/13		
	6.5	Parcel Designs & Remediation Agreements	28 wks		Mon 12/2/13		
	6.6	Final Design and RAWP	19.6 wks		Fri 2/21/14		
5 4.6. 6 4.6.		Submit Pre-Final Designs & RAWP: Blocks G & H Final Design and RAWP Approval: Blocks G-H	0 wks 1 wk 5	5	Fri 2/21/14 Fri 2/21/14		
7 4.6.		Submit Pre-Final Designs & RAWP: Blocks E&F	0 wks		Fri 3/7/14		
8 4.6.		Final Design and RAWP Approval: Blocks E&F	1 day 5	7	Fri 3/7/14		
9 4.6.		Submit Pre-Final Designs & RAWP: Block D	0 wks		Thu 4/3/14		
60 4.6.	6.6	Final Design and RAWP Approval: Block D	2 days 5		Thu 4/3/14	Fri 4/4/1	4/14
31 4.6.		Submit Pre-Final Designs & RAWP: Block C		9FF+4 wks			
32 4.6.		Final Design and RAWP Approval: Block C	0 wks 6		Wed 4/30/14		
3 4.6.	6.9	Submit Pre-Final Designs & RAWP: Block B	0 wks 6	1FF+3.1 wk	Thu 5/22/14	Thu 5/22/1	2/14

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							GAIN	IESVILLE REMEDI	AL DESIG	ЭΝ									
ID	WBS	Task Name	Duration	Predecessors	Start	Finish	tr 4 Q	2013 tr 1 Qtr 2 Qtr 3	Qtr 4 Qtr	2014 1 Qtr 2 Qtr 3 Qtr	4 Qtr 1	2015 Qtr 2 Qtr 3 Qtr 4	 Qtr 1 Q	2016 etr 2 Qtr 3 Qt	tr 4 Qtr 1	2017 Qtr 2 Qtr 3 Qtr	20 4 Qtr 1 Qtr 2	018 Qtr 3 Qtr 4	2019 Qtr 1 Qtr 2 Qt
192	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/1	3												
193	9.2	Submit ICIAP	0 wks	192	Fri 8/23/13	Fri 8/23/1	3	•											
194	9.3	Review	12.5 wks	193	Mon 8/26/13	Wed 11/20/1	3				+	_							
195	9.4	Beazer Respond to Comments	45 wks	194	Mon 4/6/15	Fri 2/12/1	6												
196	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	195	Fri 2/12/16	Fri 2/12/1	6												
197	9.6	Review	3 wks	196	Mon 2/15/16	Fri 3/4/1	6												
198	9.7	EPA and FDEP Approval of ICIAP	0 wks	197	Fri 3/4/16	Fri 3/4/1	6						•						
199	9.8	Implement Beazer-Property Restrictive Covenant	47 wks	s	Mon 3/7/16	Fri 1/27/1	7												
200	9.8.1	Draft Proprietary Controls Package	13 wks	198	Mon 3/7/16	Fri 6/3/1	6												
201	9.8.2	Submit Draft Proprietary Controls Package	0 wks	200	Fri 6/3/16	Fri 6/3/1	6							&					
202	9.8.3	Review and Updating	8 wks	201	Mon 6/6/16	Fri 7/29/1	6												
203	9.8.4	Update Title Search and Prepare Public Notice	8 wks	202	Mon 8/1/16	Fri 9/23/1	6												
204	9.8.5	Beazer Publish Public Notice	0 wks	203	Fri 9/23/16	Fri 9/23/1	6							•					
205	9.8.6	Public Comment Period	4.4 wks	204	Mon 9/26/16	Tue 10/25/1	6							<u> </u>					
206	9.8.7	Address Comments and Exectute Restrictive Covenant	5 wks	205 V	Ved 10/26/16	Tue 11/29/1	6												
207	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	206	Tue 11/29/16	Tue 11/29/1	6								\mathbf{A}				
208	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	207 V	Ved 11/30/16	Fri 1/27/1	7												
209	9.8.10	Submit Final Proprietary Controls Package	0 wks	208	Fri 1/27/17	Fri 1/27/1	7												

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Milestone ◆