



September 10, 2015

Scott Miller  
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: **August 2015 Monthly Progress Report**

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), attached is the August 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: Rusty Kestle, EPA  
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

**August 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: 0.75 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 598.11 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 3 temporary injection points (TIPs) installed in the Former Process Area as part of the In-Situ Geochemical Stabilization (ISGS) program (Table 2). Two NAPL recovery events were conducted during the month, resulting in a total of 3.7 gallons removed. Note that NAPL was not collected from most TIPs due to ISGS operations.
- 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 3,625,545 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 740 hours). The average recovery rate for the month was approximately 81.66 gallons per minute (gpm). The recovery for each component is listed below.
  - Surficial Aquifer
    - Perimeter Extraction Wells: 609,237 gallons
    - Former North Lagoon Drain: 406,300 gallons
    - Former Drip Track Drain: 480,330 gallons
    - Former Process Area Drain: 0 gallons (Inactive due to ISGS operations)
    - Former South Lagoon Drain: 412,100 gallons
  - Upper Floridan Extraction Wells
    - FW-6: 28,584 gallons
    - FW-21B: 200,667 gallons
    - FW-31BE: 984,050 gallons
    - FW-32BE: 504,277 gallons

Approximately 366.8 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 1,967,000 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 system was down for 4 hrs on Aug 31, 2015 due to electrical breaker trip and 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.
- UIC Sampling on Aug 19, 2015.
- Third quarter sampling event: August 16 - 21, 2015.
- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) Aug 27, 2015.
- *Pre-Design Investigation Work Plan: Design Track 2 (Version 2)* submitted on Aug 25, 2015.
- *Quality Assurance Project Plan for the Comprehensive Groundwater Monitoring Plan at Cabot Carbon/Koppers Superfund Site (Former Koppers Facility) Gainesville, Florida (Rev 1)* was submitted on Aug 27, 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).
- Rebuilt transfer pump.
- Cleaned flow meters.
- Repaired/Replaced EW-1 and EW-3 pump, motor, and flow meter chambers.
- Installed new EW-11 pump and flush lines.
- Replaced EW-3 pump head.
- Rewired EW-14 pump.
- Replaced Drip Track remote reader.
- Installed new transfer pump.
- Irrigation Breakthrough and TSE sampling on Aug 4, 2015.
- On-property irrigation using treated groundwater from FW-6, FW-21B, FW-31BE, and FW-32BE.

### **4. Upcoming Actions:**

- Design Track 2 pre-design investigation field tasks beginning September 28, 2015.
- NAPL collection at Upper Hawthorn monitoring wells: bi-weekly, except in 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)	DNAPL Volume (gal)		Total This Month (gal)
	July 2015	8/5/2015	8/20/2015	August 2015
HG-9S	0	Stain	ND	0
HG-10S	0	Stain	Stain	0
HG-10D	0	Stain	Stain	0
HG-11S	0.25	*	*	0
HG-12S	0.5	0.3	0.3	0.6
HG-12D	0	ND	ND	0
HG-15S	0.2	*	*	0
HG-16S	0	Stain	0.15	0.15
HG-16D	0	Stain	Stain	0
MW-22B	0	Stain	ND	0
Total	0.95	0.3	0.45	0.75
Cumulative Total	597.36			598.11

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) (3 events) July 2015	DNAPL Volume (gal) 8/13/2015	DNAPL Volume (gal) 8/26/2015	Total This Month (gal) August 2015
220N/180E	5.6	2.3	*	2.3
280N/380E	3.2	*	*	0
300N/180E	7.8	*	*	0
300N/420E	3	*	*	0
320N/220E	4.9	*	*	0
320N/300E	8.7	*	*	0
340N/340E	15.3	*	*	0
360N/280E	3.2	*	*	0
380N/340E	5.4	*	*	0
400N/380E	1.3	*	*	0
460N/340E	1.6	*	*	0
420N/345E	1.7	*	*	0
220N/340E	0.8	*	*	0
240N/380E	1.4	*	*	0
340N/180E	0.4	*	*	0
320N/140E	1	*	*	0
300N/260E	2	*	*	0
360N/140E	0.4	*	*	0
400N/140E	0.3	*	*	0
200N/220E	2.8	0.9	*	0.9
280N/220E	2.4	*	*	0
360N/220E	2.6	*	*	0
280N/300E	4.4	*	*	0
360N/380E	3.2	*	*	0
507N/260E	0	*	*	0
Drip Track	1.1	0.2	0.3	0.5
Total	84.5			3.7

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
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>117.2 wks</b>		<b>Tue 4/30/13</b>	<b>Tue 7/28/15</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	4.4	<b>4.4 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	4.5	<b>4.5 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	4.6	<b>4.6 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	4.6.6	<b>4.6.6 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																	

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Task Milestone

Summary







GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	2013				2014				2015				2016				2017				2018			
							tr 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
191	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13																								
192	9.2	Submit ICIAP	0 wks	191	Fri 8/23/13	Fri 8/23/13																								
193	9.3	Review	12.5 wks	192	Mon 8/26/13	Wed 11/20/13																								
194	9.4	Beazer Respond to Comments	31 wks	193	Mon 4/6/15	Fri 11/6/15																								
195	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	194	Fri 11/6/15	Fri 11/6/15																								
196	9.6	Review	3 wks	195	Mon 11/9/15	Fri 11/27/15																								
197	9.7	EPA and FDEP Approval of ICIAP	0 wks	196	Fri 11/27/15	Fri 11/27/15																								
198	9.8	<b>Implement Beazer-Property Restrictive Covenant</b>	<b>47 wks</b>		<b>Mon 11/30/15</b>	<b>Fri 10/21/16</b>																								
199	9.8.1	Draft Proprietary Controls Package	13 wks	197	Mon 11/30/15	Fri 2/26/16																								
200	9.8.2	Submit Draft Proprietary Controls Package	0 wks	199	Fri 2/26/16	Fri 2/26/16																								
201	9.8.3	Review and Updating	8 wks	200	Mon 2/29/16	Fri 4/22/16																								
202	9.8.4	Update Title Search and Prepare Public Notice	8 wks	201	Mon 4/25/16	Fri 6/17/16																								
203	9.8.5	Beazer Publish Public Notice	0 wks	202	Fri 6/17/16	Fri 6/17/16																								
204	9.8.6	Public Comment Period	4.4 wks	203	Mon 6/20/16	Tue 7/19/16																								
205	9.8.7	Address Comments and Execute Restrictive Covenant	5 wks	204	Wed 7/20/16	Tue 8/23/16																								
206	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	205	Tue 8/23/16	Tue 8/23/16																								
207	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	206	Wed 8/24/16	Fri 10/21/16																								
208	9.8.10	Submit Final Proprietary Controls Package	0 wks	207	Fri 10/21/16	Fri 10/21/16																								

Red text used for current tasks

Task  Milestone  Summary 