



March 9, 2016

Mr. Rusty Kestle
Remedial Project Manager
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Subject: **Responses to EPA Comments on:
QAAP for the Comprehensive Groundwater Monitoring Plan**
Cabot/Koppers Superfund Site
Alachua County, Florida

Dear Mr. Kestle:

On behalf of Beazer East, Inc. (Beazer), we are providing responses to the comments in Scott Miller's September 14, 2015 draft comment letter regarding the *QAAP for the Comprehensive Groundwater Monitoring Plan* (Tetra Tech, August 10, 2015). We are also providing an updated version of the Quality Assurance Project Plan (QAAP, Revision 2) authored by Environmental Standards.

If you have any questions regarding these responses, please contact Mitchell Brouman or me.

Sincerely,

A handwritten signature in blue ink that reads 'Greg W. Council'.

Gregory W. Council
Principal Engineer

Attachments:

- Responses to Comments
- *Quality Assurance Project Plan for the Comprehensive Groundwater Monitoring Plan, Revision 2*

Distribution:

Franklin Hill, USEPA
Paula Painter, USEPA
Kelsey Helton, Florida Department of Environmental Protection
Gus Almos, Alachua County Environmental Protection Division
Robin Halbourg, Alachua County Environmental Protection Division
Stewart Pearson, City of Gainesville
Rick Hutton, Gainesville Regional Utilities
John Herbert, GeoHydro Consultants
Pat Cline, Community Technical Advisor
Mitchell Brouman, Beazer
Mike Slenska, Beazer
Steve Zeiner, Environmental Standards
Angie Gatchie, Field & Technical Services
Jim Erickson, Tetra Tech

Analytes Reported

EPA Comment: Please update the reported analytes to include all compounds for each standard reference test method identified (metals, semivolatiles, volatiles).

Response:

For many years, Beazer has been reporting the concentrations of the key Site-related analytes in groundwater that may affect remediation decisions and compliance evaluation. The rationale for the choice of the analytes has been provided in the Comprehensive Groundwater Monitoring Sampling and Analysis Plan (CGMSAP: Field & Technical Services, latest version is Revision 05 dated June 30, 2014). The analyte list includes semivolatiles (PAHs, pentachlorophenol, and other phenolic compounds), a few volatiles (benzene, toluene, ethylbenzene, and xylenes – BTEX), and two inorganics (arsenic and chromium). These compounds are listed in Table 1 of the attached, revised QAPP, and in Tables 5-3, 5-4, 5-6 of the GCMSAP.

Additionally, Beazer previously agreed to add several high-molecular-weight PAHs to the list of analyte concentrations reported by the laboratory (see CGMSAP: footnotes to tables 5-3, 5-4, 5-6 and Section 5.9). However, due to an oversight by the Beazer team, the QAPP has heretofore not mentioned these additional PAHs and the lab has not been reporting them. The attached, revised QAPP includes these additional PAHs for reporting in future rounds of sampling (see Table 2 of the QAPP).

Expanding the list of analytes beyond this is not needed. All Site-related constituents of interest with cleanup goals listed in the Site Record of Decision (2011 Amended ROD) are already included. Expanding the analyte list to include all analytes detectable by the lab methods would result in a substantial and unnecessary cost to Beazer through increased lab fees and increased effort for data validation and management.

Regulatory Standards

EPA Comment: Please update the QAPP to identify all regulatory standards for which groundwater sampling and analysis is occurring. Please identify each compound with the applicable regulatory standard(s) for which sampling is occurring.

Response: Table 1 in the attached, revised QAPP includes the applicable groundwater regulatory standards for the compounds that are evaluated in periodic monitoring reports. These standards have been, and will continue to be, listed in the monitoring reports.

Electronic Deliverables

EPA Comment: Please update the Submittal to include the requirement that all data will be delivered electronically to EPA through upload to the EQUIS Database as described by the enclosed document directing responsible parties to upload sampling data to EPA's electronic database.

Response: The attached, revised QAPP includes this requirement: see Section 8.3.