



June 11, 2014

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: **May 2014 Monthly Progress Report**

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), attached is the May 2014 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 that reads 'Gregory W. Council'.

Gregory W. Council, P.E.
Principal Engineer

cc: Rusty Kestle, EPA
Kelsey Helton, FDEP
John Mousa, 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

May 2014
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.
- The bi-weekly passive NAPL recovery program continues at Upper Hawthorn monitoring wells: 4.15 gallons of NAPL were removed from Upper Hawthorn wells during the past month (3 recovery events). A total of 567 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 23 temporary injection points (TIPs) installed in the Former Process Area as part of the In-Situ Geochemical Stabilization (ISGS) program (Table 2). This is a pilot demonstration for full scale design. Two NAPL recovery events were conducted during the month, resulting in a total of 137.9 gallons removed. TIPs 360N 140E, 400N 140E, 200N 220E, 280N 220E, 3560N 220E and 280N 300E were added to the program in May. In April 220N 340E was incorrectly marked in the Table 2 as inside the ISGS Pilot Test Area. TIP 420N 340E is in the ISGS Pilot Test Area.
- NAPL was removed from four Upper Hawthorn recovery wells installed in the Former Process Area as part of the ISGS program (Table 3). Two NAPL recovery events were conducted during the month, resulting in 31.1 gallons removed.
- A total of 3,967,124 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 675 hours). The average recovery rate for the month was approximately 89 gallons per minute (gpm). The recovery for each component is listed below.
 - Surficial Aquifer
 - Perimeter Extraction Wells: 626,484 gallons
 - Former North Lagoon Drain: 421,560 gallons
 - Former Drip Track Drain: 465,960 gallons
 - Former Process Area Drain: 433,310 gallons
 - Former South Lagoon Drain: 465,750 gallons
 - Upper Floridan Extraction Wells
 - FW-6: 55,979 gallons
 - FW-21B: 131,303 gallons
 - FW-31BE: 917,950 gallons
 - FW-32BE: 448,828 gallons

Approximately 332.3 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 2,444,000 gallons. The remaining portion of the water, from Upper Floridan Aquifer wells, was treated and used for on-Property irrigation.

There was no system downtime in the month of May.

3. Plans, Reports, Deliverables and Procedures Completed:

- *Remedial Action Work Plan (RAWP) Off-Property Soil Replacement Block B* was submitted on May 21, 2014.
- Off-Property soil replacement at Blocks B-H of the Stephen Foster Neighborhood.
- Remedial Design/Remedial Action Status Update Meeting (EPA/Beazer) May 28, 2014.
- Periodic maintenance checks and inspections.
- Treatment-plant component maintenance and repair as needed (caustic pump, carbon vessel gaskets and gauges, sludge pump diverter valve).
- Replace diverter valve on sludge tank.
- Pull and replace EW-2 and EW-3 pumps.
- Pull and repair EW-8 pump.
- Repair filter press.
- On-property irrigation using treated groundwater from FW-6, FW-21B, FW-31BE, and FW-32BE.
- Remediation agreement proposals sent to property owners in Blocks I.
- Irrigation Breakthrough sampling on May 5 and 20, 2014.
- TSE GRU spilt samples May 20, 2014

4. Upcoming Actions:

- RAWPs for Blocks A and I.
- Off-Property Remedial Action at Block B and C.
- Off-Property Remedial Action at Block A, beginning May 21, 2014.
- NAPL collection at Upper Hawthorn monitoring wells: bi-weekly.
- NAPL collection at temporary Upper Hawthorn ISGS injection points: bi-weekly.
- Second quarter groundwater sampling event: planned for June 2 -6, 2014.
- Routine inspection, operation, maintenance, and monitoring.
- ISGS core sampling June 23 – 27, 2014.
- ISGS technical meeting July 10, 2014.
- Third quarter groundwater sampling event: planned for August 11-15, 2014.

5. Schedule Status:

- The current remedial design schedule is attached.
- No significant delays were encountered during the reporting period.

6. Plan/Schedule Modifications:

- Minor schedule modifications were made to the schedule submitted last month.

7. Community Involvement:

- Conducted tours of the Off-Site remediation areas for City Mayor and City Commissioners.
- Tetra Tech's Community Coordinator has been in touch with many residents and property owners in the Stephen Foster neighborhood, and has been working closely with the city's community coordinators for the Stephen Foster soil replacement work.
- Future community involvement activities will be coordinated with EPA.

Table 1. DNAPL Recovery - Hawthorn Group Monitoring Wells

Well ID	Total Last Month (gal) (1 event) April 2014	DNAPL Volume (gal) 5/1/2014	DNAPL Volume (gal) 5/14/2014	DNAPL Volume (gal) 5/29/2014	Total This Month (gal) May 2014
HG-9S	0	Stain	Stain	Stain	0
HG-10S	0	Stain	Stain	Stain	0
HG-10D	0	Stain	Stain	Stain	0
HG-11S	0.8	0.55	0.4	0.4	1.35
HG-12S	0.55	0.5	0.5	0.4	1.4
HG-12D	0	ND	ND	ND	0
HG-15S	0.55	0.4	0.4	0.35	1.15
HG-16S	0.3	Stain	Stain	0.25	0.25
HG-16D	0	Stain	Stain	Stain	0
MW-22B	0	Stain	Stain	Stain	0
Total	2.2	1.45	1.3	1.4	4.15
Cumulative Total	563.11				567.26

ND - No DNAPL Detected

Table 2. DNAPL Recovery Temporary Injection Points (TIPs)

Well ID	Total Last Month (gal) (2 events) April 2014	DNAPL Volume (gal) 5/7/2014	DNAPL Volume (gal) 5/21/2014	Total This Month (gal) May 2014
220N 180E	4.6	3.1	2.6	5.7
280N 380E	3.4	3.5	3.7	7.2
300N 180E	9.4	7.2	4.5	11.7
300N 420E	4.1	5	3.5	8.5
320N 220E	5.2	4.2	3.4	7.6
320N 300E	3.9	4	3.6	7.6
340N 340E	6.6	6.2	5.7	11.9
360N 280E	6.2	3.9	4.2	8.1
380N 340E	8.4	9.1	7.4	16.5
400N 380E	3.8	2.1	1.6	3.7
460N 340E	3.2	1.5	1.4	2.9
420N 340E *	0	2.1	1.6	3.7
220N 340E	2.3	1.6	0.7	2.3
240N 380E	3.3	2.8	1.3	4.1
340N 180E	1.3	1.1	1	2.1
320N 140E	5.3	1.1	0.6	1.7
300N 260E	3.2	0.3	0.7	1
360N 140E	NP	1.4	0.9	2.3
400N 140E	NP	3	1.8	4.8
200N 220E	NP	3.1	1.3	4.4
280N 220E	NP	6.6	2	8.6
360N 220E	NP	4.6	1.6	6.2
280N 300E	NP	4	1.3	5.3
Total	156.2	81.5	56.4	137.9

NP - Not Pumped

* Inside ISGS Pilot Test Area

Table 3. DNAPL ISGS Recovery Data - DNAPL Recovery Wells

Well ID	Total Last Month (gal) (2 events) April 2014	DNAPL Volume (gal) 5/14/2014	DNAPL Volume (gal) 5/28/2014	Total This Month (gal) May 2014
M-38BE	0	Stain	NR	0
M-39BE	NR	NR	NR	NR
M-40BE	NR	NR	NR	NR
M-41BE	NR	NR	NR	NR
M-42BE	NR	NR	NR	NR
HG-36SE *	2.1	NR	NR	NR
HG-37SE	12.6	4.7	3.2	7.9
HG-38SE	14.7	5.1	5.0	10.1
HG-39SE	11	3.4	3.3	6.7
HG-40SE	10.4	3.3	3.1	6.4
Total	50.8	16.5	14.6	31.1

NR - No Recovery

* Inside ISGS Pilot Test Area

GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	Timeline																																																											
							1Q13	2Q13	3Q13	4Q13	1Q14	2Q14	3Q14	4Q14	1Q15	2Q15	3Q15	4Q15	1Q16	2Q16	3Q16	4Q16	1Q17	2Q17	3Q17																																									
							J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D
1		1 Consent Decree for RD/RA	23.8 wks		Thu 2/7/13	Wed 7/24/13																																																												
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		2 Remedial Design Work Plan (RDWP)	22.3 wks		Wed 7/24/13	Thu 12/26/13																																																												
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		3 Supporting Plans for RD/RA	32.2 wks		Fri 9/20/13	Mon 5/5/14																																																												
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	Quality Assurance Project Plan (update)	4 wks		Mon 2/24/14	Fri 3/21/14																																																												
24	3.7	Data Management Plan	3 wks	23	Mon 3/24/14	Fri 4/11/14																																																												
25																																																																		
26		4 Off-Property Soil Replacement (OU-5): DESIGN TRACK #1	63.1 wks		Tue 4/30/13	Tue 7/15/14																																																												
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	4.4 Sampling for Refinement of Remediation Parcels (July 2013)	18.8 wks		Fri 7/19/13	Wed 11/27/13																																																												
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	4.5 Pilot Home Soil Replacement	10.3 wks		Thu 9/26/13	Fri 12/6/13																																																												
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	4.6 Blocks A-I Remediation Design	41.3 wks		Mon 9/16/13	Tue 7/1/14																																																												
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																																																												

GAINESVILLE REMEDIAL DESIGN

ID	WBS	Task Name	Duration	Predecessors	Start	Finish	1Q13	2Q13	3Q13	4Q13	1Q14	2Q14	3Q14	4Q14	1Q15	2Q15	3Q15	4Q15	1Q16	2Q16	3Q16	4Q16	1Q17	2Q17	3Q17																																		
							J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M
162	8.2	Submit Pre-Design Work Plan	0 wks	161	Fri 7/10/15	Fri 7/10/15																																																					
163	8.3	Review and Approval	6 wks	162	Mon 7/13/15	Fri 8/21/15																																																					
164	8.4	EPA Approval of Pre-Design Work Plan	0 wks	163	Fri 8/21/15	Fri 8/21/15																																																					
165	8.5	Pre-Design Investigation	26 wks	164	Mon 8/24/15	Fri 2/19/16																																																					
166	8.6	Preliminary Design	6 wks	165	Mon 2/22/16	Fri 4/1/16																																																					
167	8.7	Submit Preliminary Design	0 wks	166	Fri 4/1/16	Fri 4/1/16																																																					
168	8.8	Review and Comment	6 wks	167	Mon 4/4/16	Fri 5/13/16																																																					
169	8.9	Pre-Final Design	13 wks	168	Mon 5/16/16	Fri 8/12/16																																																					
170	8.10	Review and Comment	6 wks	169	Mon 8/15/16	Fri 9/23/16																																																					
171	8.11	Final Design	6 wks	170	Mon 9/26/16	Fri 11/4/16																																																					
172	8.12	Review	4 wks	171	Mon 11/7/16	Fri 12/2/16																																																					
173	8.13	EPA Approval of Final Design	0 wks	172	Fri 12/2/16	Fri 12/2/16																																																					
174	8.14	Prepare RAWP	8 wks	173	Mon 12/5/16	Fri 1/27/17																																																					
175	8.15	Submit RAWP	0 wks	174	Fri 1/27/17	Fri 1/27/17																																																					
176																																																											
177	9	Institutional Control	103.3 wks		Tue 7/9/13	Wed 7/1/15																																																					
178	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13																																																					
179	9.2	Submit ICIAP	0 wks	178	Fri 8/23/13	Fri 8/23/13																																																					
180	9.3	Review	12.5 wks	179	Mon 8/26/13	Wed 11/20/13																																																					
181	9.4	Beazer Respond to Comments	34 wks	180	Wed 11/20/13	Wed 7/16/14																																																					
182	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	181	Wed 7/16/14	Wed 7/16/14																																																					
183	9.6	Review	3 wks	182	Wed 7/16/14	Wed 8/6/14																																																					
184	9.7	EPA and FDEP Approval of ICIAP	0 wks	183	Wed 8/6/14	Wed 8/6/14																																																					
185	9.8	Implement Beazer-Property Restrictive Covenant	47 wks		Wed 8/6/14	Wed 7/1/15																																																					
186	9.8.1	Draft Proprietary Controls Package	13 wks	184	Wed 8/6/14	Wed 11/5/14																																																					
187	9.8.2	Submit Draft Proprietary Controls Package	0 wks	186	Wed 11/5/14	Wed 11/5/14																																																					
188	9.8.3	Review and Updating	8 wks	187	Wed 11/5/14	Wed 12/31/14																																																					
189	9.8.4	Update Title Search and Prepare Public Notice	8 wks	188	Wed 12/31/14	Wed 2/25/15																																																					
190	9.8.5	Beazer Publish Public Notice	0 wks	189	Wed 2/25/15	Wed 2/25/15																																																					
191	9.8.6	Public Comment Period	4.4 wks	190	Wed 2/25/15	Fri 3/27/15																																																					
192	9.8.7	Address Comments and Execute Restrictive Covenant	5 wks	191	Fri 3/27/15	Fri 5/1/15																																																					
193	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	192	Fri 5/1/15	Fri 5/1/15																																																					
194	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	193	Fri 5/1/15	Wed 7/1/15																																																					
195	9.8.10	Submit Final Proprietary Controls Package	0 wks	194	Wed 7/1/15	Wed 7/1/15																																																					