



April 15, 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: **March 2014 Monthly Progress Report**

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), attached is the March 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, appearing to read '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  
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

**March 2014**  
**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.
- The bi-weekly passive NAPL recovery program continues at Upper Hawthorn monitoring wells: 1.15 gallons of NAPL were removed from Upper Hawthorn wells during the past month (1 recovery event on March 5, 2014). A total of 563 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 17 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. Recovery at TIPs 320N 140E and 300N 260E started in March, 2014. One NAPL recovery event was conducted during the month, with an additional removal at 420N 340E, resulting in a total of 122.6 gallons removed.
- NAPL was removed from one Surficial Aquifer well and five Upper Hawthorn recovery wells installed in the Former Process Area as part of the ISGS program (Table 3). One NAPL recovery event was conducted during the month, resulting in 28.5 gallons removed.
- A total of 3,953,795 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 744 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: 628,928 gallons
    - Former North Lagoon Drain: 258,670 gallons
    - Former Drip Track Drain: 526,620 gallons
    - Former Process Area Drain: 496,090 gallons
    - Former South Lagoon Drain: 444,270 gallons
  - Upper Floridan Extraction Wells
    - FW-6: 31,941 gallons
    - FW-21B: 168,568 gallons
    - FW-31BE: 941,350 gallons
    - FW-32BE: 497,870 gallons

Approximately 327.7 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 2,448,000 gallons. The remaining portion of the water, from Upper Floridan Aquifer wells, was treated and used for on-Property irrigation.

The Former South Lagoon and Former Process groundwater drain pumps were turned off for approximately 7 hours to pump and clean clarifiers and to treat backwash water.

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

- *Remedial Action Work Plan (RAWP) Off-Property Soil Replacement Block E* was submitted on March 7, 2014 and *Remedial Action Work Plan (RAWP) Off-Property Soil Replacement Block E Addendum* was submitted on March 24, 2014.
- Off-Property soil replacement at Blocks G, H, and E of the Stephen Foster Neighborhood.
- Began ISGS Pilot Test in Process Area
- Remedial Design/Remedial Action Status Update Call (EPA/Beazer) March 31, 2014.
- Surveying at properties in the Stephen Foster Neighborhood.
- Interviews of Stephen Foster neighborhood property owners and residents.
- Periodic maintenance checks and inspections.
- Treatment-plant component maintenance and repair as needed.
- Pull and clean FW-31BE flow meter
- Repair pump and compressor for FW-6
- Remove failed North Lagoon pump to order replacement
- Troubleshoot filter feed pump at treatment facility.
- On-property irrigation using treated groundwater from FW-6, FW-21B, FW-31BE, and FW-32BE.
- Remediation agreement proposals sent to property owners in C and D blocks.

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

- Continuation of landscape surveys and interviews in the Stephen Foster neighborhood.
- RAWPs for Blocks D, C, B, A and I.
- Off-Property Remedial Action at Block D, beginning April 8, 2014.
- Off-Property Remedial Action at Block C.
- Completion of ISGS Pilot Test.
- 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.

### **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:**

- 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) (2 events) February 2014	DNAPL Volume (gal) 3/5/2014	Total This Month (gal) March 2014
HG-9S	0	Stain	0
HG-10S	0	ND	0
HG-10D	0	Stain	0
HG-11S	0.7	0.4	0.4
HG-12S	0.65	0.35	0.35
HG-12D	0	ND	0
HG-15S	0.55	0.4	0.4
HG-16S	0.4	Stain	0
HG-16D	0	Stain	0
MW-22B	0	Stain	0
Total	2.3	1.15	1.15
Cumulative Total	561.96		563.11

ND - No DNAPL Detected

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

Well ID	Total Last Month (gal) (1 event Plus 420N 340E)	DNAPL Volume (gal)	DNAPL Volume (gal)	Total This Month (gal)
	February 2014	3/10/2014	3/27/2014	March 2014
220N 180E	6.1	3.2	NP	3.2
280N 380E	6.5	3.4	NP	3.4
300N 180E	19.6	5.1	NP	5.1
300N 420E	6.9	2.5	NP	2.5
320N 220E	7	3	NP	3
320N 300E	6.6	3.1	NP	3.1
340N 340E	11.3	6.2	NP	6.2
360N 280E	8	3.6	NP	3.6
380N 340E	13.9	6	NP	6
400N 380E	12.8	6.2	NP	6.2
460N 340E	5.3	2.2	NP	2.2
420N 340E	45.5	23.8	41.3	65.1
220N 340E	2.2	0.7	NP	0.7
240N 380E	3.4	1.3	NP	1.3
340N 180E*	1.1	0.5	NP	0.5
320N 140E**	N/A	5.1	NP	5.1
300N 260E**	N/A	5.4	NP	5.4
<b>Total</b>	<b>156.2</b>	<b>70.8</b>	<b>41.3</b>	<b>122.6</b>

\*340N 180E Started recovery in Feb. 2014

\*\* Started recovery in March 2014

NP - Not Pumped

**Table 3. DNPL ISGS Recovery Data - DNPL Recovery Wells**

Well ID	Total Last Month (gal) (2 events) February 2014	DNAPL Volume (gal) 3/4/2014	Total This Month (gal) March 2014
M-38BE	1.5	Stain	0
M-39BE	NR	NR	NR
M-40BE	NR	NR	NR
M-41BE	NR	NR	NR
M-42BE	NR	NR	NR
HG-36SE	33	15.2	15.2
HG-37SE	6.7	3.1	3.1
HG-38SE	10.4	5.1	5.1
HG-39SE	5.2	2.5	2.5
HG-40SE	5.6	2.6	2.6
Total	62.4	28.5	28.5

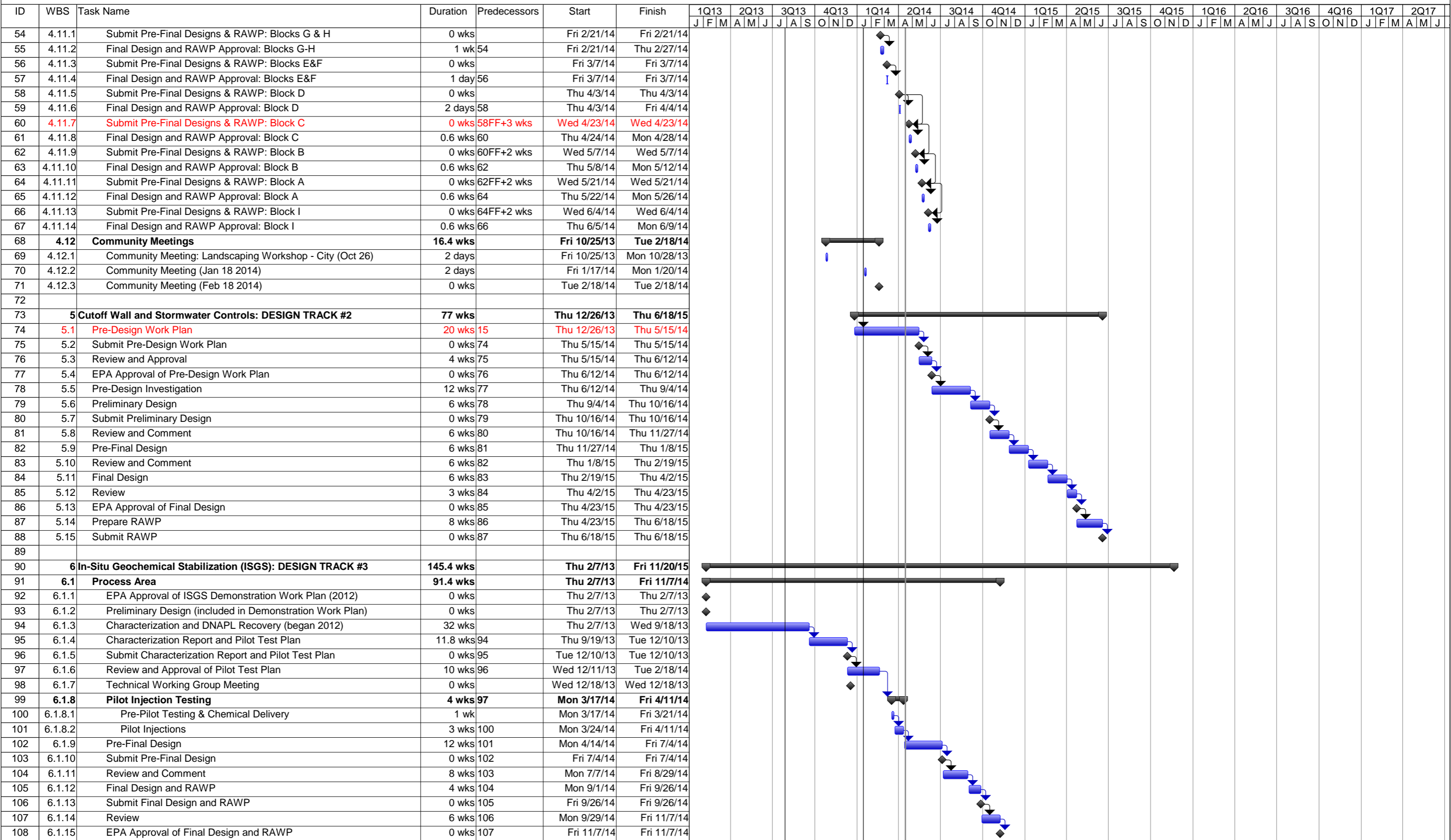
NR - No Recovery

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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	
							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	<b>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	2	<b>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	3	<b>Supporting Plans for RD/RA</b>	<b>32.2 wks</b>		<b>Fri 9/20/13</b>	<b>Mon 5/5/14</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	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	<b>Off-Property Soil Replacement (OU-5): DESIGN TRACK #1</b>	<b>58 wks</b>		<b>Tue 4/30/13</b>	<b>Mon 6/9/14</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>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>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	Remedial Design Details	12.4 wks	35	Thu 11/28/13	Fri 2/21/14																																				
49	4.7	Submit RD Details	0 wks	48	Fri 2/21/14	Fri 2/21/14																																				
50	4.8	Review and Comment	0.8 wks	49	Mon 2/24/14	Thu 2/27/14																																				
51	4.9	Surveying & Interviews	34 wks		Mon 9/16/13	Fri 5/9/14																																				
52	4.10	Parcel Designs & Remediation Agreements	25 wks		Mon 12/2/13	Fri 5/23/14																																				
53	4.11	<b>Final Design and RAWP</b>	<b>15.4 wks</b>		<b>Fri 2/21/14</b>	<b>Mon 6/9/14</b>																																				



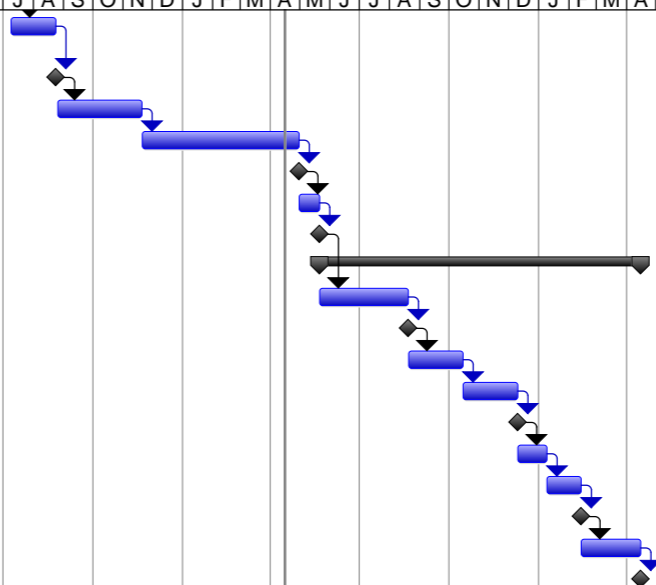
GAINESVILLE REMEDIAL DESIGN





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			
							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
163	9.1	Prepare Institutional Control Implementation and Assurance Plan (ICIAP)	6.8 wks	5	Tue 7/9/13	Fri 8/23/13																																						
164	9.2	Submit ICIAP	0 wks	163	Fri 8/23/13	Fri 8/23/13																																						
165	9.3	Review	12.5 wks	164	Mon 8/26/13	Wed 11/20/13																																						
166	9.4	Beazer Respond to Comments	23 wks	165	Wed 11/20/13	Wed 4/30/14																																						
167	9.5	Beazer Submit Responses & ICIAP Version 2	0 wks	166	Wed 4/30/14	Wed 4/30/14																																						
168	9.6	Review	3 wks	167	Wed 4/30/14	Wed 5/21/14																																						
169	9.7	EPA and FDEP Approval of ICIAP	0 wks	168	Wed 5/21/14	Wed 5/21/14																																						
170	9.8	Implement Beazer-Property Restrictive Covenant	47 wks		Wed 5/21/14	Wed 4/15/15																																						
171	9.8.1	Draft Proprietary Controls Package	13 wks	169	Wed 5/21/14	Wed 8/20/14																																						
172	9.8.2	Submit Draft Proprietary Controls Package	0 wks	171	Wed 8/20/14	Wed 8/20/14																																						
173	9.8.3	Review and Updating	8 wks	172	Wed 8/20/14	Wed 10/15/14																																						
174	9.8.4	Update Title Search and Prepare Public Notice	8 wks	173	Wed 10/15/14	Wed 12/10/14																																						
175	9.8.5	Beazer Publish Public Notice	0 wks	174	Wed 12/10/14	Wed 12/10/14																																						
176	9.8.6	Public Comment Period	4.4 wks	175	Wed 12/10/14	Fri 1/9/15																																						
177	9.8.7	Address Comments and Execute Restrictive Covenant	5 wks	176	Fri 1/9/15	Fri 2/13/15																																						
178	9.8.8	Record Restrictive Covenant at Alacha County Clerk of Court	0 wks	177	Fri 2/13/15	Fri 2/13/15																																						
179	9.8.9	Prepare Final Proprietary Controls Package	8.6 wks	178	Fri 2/13/15	Wed 4/15/15																																						
180	9.8.10	Submit Final Proprietary Controls Package	0 wks	179	Wed 4/15/15	Wed 4/15/15																																						



Red text used for current tasks

Task Milestone

Summary