

From: [Helton, Kelsey](#)
To: [Robin Hallbourg](#); [John Mousa](#)
Subject: FW: Koppers- UIC Variance and ISBS Pilot Work Plan
Date: Tuesday, January 29, 2008 5:44:16 PM
Attachments: [Revised Nov 19 2007 10 max Variance S 1 Beazer East RemO..pdf](#)
[RemOx EC Stabilization Reagent MSDS.pdf](#)
[RemOx L ISCO Reagent MSDS.pdf](#)
[Response to FL DEP comments re variance df 11-27.pdf](#)

John, Robin- Attached is the Revised ISBS Variance request (w/out UIC Memo). Based on the draft variance- which I will forward next- and the September 2006 UIC Memo from Beazer, the comments below were generated that essentially say, If you make these changes to your proposal (UIC Memo), then you are in compliance with upcoming variance and UIC requirements. I have not gotten confirmation back from Beazer that the recommendations have been incorporated in the scope. With these comments, draft variance from DEP and the original Sept 2006 UIC Memo, you should have all you need to see what is required to conduct the pilot. Robin- Thanks for being on site- Kelsey

The Department of Environmental Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.

From: Helton, Kelsey
Sent: Saturday, January 12, 2008 4:41 PM
To: 'Council, Greg'; 'Brouman, Mitch (Pittsburgh) NA'; 'jim.mueller@adventusgroup.com'; 'nmisquitta@keyenvir.com'
Cc: Helton, Kelsey; Cowdery, Robert; McCarty, Cathleen; 'Miller.Scott@epamail.epa.gov'
Subject: FW: Koppers- UIC Variance and ISBS Pilot Work Plan

Mr. Brouman, Mr. Council, Mr. Misquitta, Mr. Mueller -

This email provides review comments from the DEP/ Bureau of Waste Cleanup/Hazardous Waste Cleanup Section (HWCS) on the proposed ISBS pilot study in the surficial aquifer at the Koppers Superfund site, Gainesville. As acknowledged in a previous email to EPA, while the administrative components of a variance or permit are exempt under Superfund, demonstration that the substantive (technical) requirements of that variance have been met is necessary and not exempt. It's the role of the HWCS to review the proposed scope of work/design and UIC Memo Summary to ensure consistency and compliance with those substantive requirements. To this end, the HWCS PE and I have reviewed and discussed the attached documents as well as related submittals discussed below and consulted with the DEP- UIC Section. Please note that DEP- UIC has not finalized the site-specific variance, and there may be additional analytes or conditions substantive to compliance with the variance requirements; however, we anticipate that any necessary adjustments, beyond those identified below, can be incorporated to minimize delays or impacts to the project. And are making every attempt to finalized those requirements prior to the January 23, 2008, pilot move date. We appreciate Beazer's continued efforts to accommodate those adjustments.

The focus of HWCS review is on the proposed monitoring points, and frequency and scope of

sampling and analysis to demonstrate compliance with substantive UIC rule and variance requirements. Briefly- based on initial DEP comments and subsequent response and revised petition, we anticipate that substantive Site-Specific Variance requirements will include the following. These requirements should be specifically incorporated into the previously submitted (September 27, 2007) Field Plan including Table 3 and figures and the (October 2, 2007) UIC Summary Memo -

- 1) 150' radius temporary Zone of Discharge (ZOD) extending downgradient from the injection area(s) where temporary exceedances of Primary and/or Secondary groundwater standards are allowed by UIC Variance or Rule.
- 2) For this proposed remedial pilot, Primary standard analytes must include sodium, , antimony, arsenic, beryllium, cadmium, chromium, lead, mercury, selenium, thallium.
- 3) For this proposed remedial pilot, Secondary standard analytes must include aluminum, chloride, color, iron, manganese, pH and total dissolved solids (TDS).
- 4) Pre-Injection background and baseline sampling of groundwater monitoring wells prior to ISBS injection w/ analysis for the above 10 Primary and 7 Secondary standard analytes. Monitoring wells should include MW-14 (upgradient background), the 2 proposed MWs in the ISBS test areas, existing MW-1 (approx 250' downgradient) and a surficial aquifer MW to be installed & located at the ZOD point of compliance, approx 150' downgradient of the test areas, per the variance application. Please note, the proposed existing monitoring well HG-10S is not sufficient as a compliance well since it is not screened in the surficial aquifer where the temporary ZOD applies. However, we are not opposed to inclusion of HG-10S in the monitoring program if it may provide some information as to potential vertical communication into the Hawthorn Group.
- 5) Post-Injection Monitoring- UIC compliance monitoring should include sampling of the above monitoring wells (excluding MW-14) approx the 16 weeks after injections (approx 3 months) as proposed in the Field Plan as well as Quarterly thereafter (3 events), corresponding to the 1 year post- injection duration of the temporary ZOD proposed in the variance application. The monitoring frequency may be adjusted if subsequent injections are proposed. Please correct Section 3.3.4 of Field Plan to reflect above monitoring wells and that groundwater sample analyses will include the Primary and Secondary standard analytes identified above and monitoring will continue until those standards or background are met.
- 6) Please note that in the UIC memo, there is incorrect reference to an ISBS pilot test in the Upper Hawthorn Group, rather than the surficial aquifer at the site. This should be corrected.
- 7) Note- on Table 3 of Field Plan, soil/water analytical method is identified as EPA Method 8270 while in the text Section 3.3.4, post treatment monitoring, Method 8260 is referenced.

Thank you in advance for your responsiveness to the above comments. If you have any questions, I can be reached at 850-245-8969 or the HWCS PE, Rob Cowdery can be reached at 850-245-8964. Next week (1/13) , I am in Texas part of time and then Delray Bch, FL at a soil dig, but you can reach me on my cell at 850-567-6234, if necessary.

Thank you-

Kelsey Helton
DEP- Bureau of Waste Cleanup
Hazardous Waste Cleanup Section
850-245-8969

From: jim.mueller@adventusgroup.com [mailto:jim.mueller@adventusgroup.com]
Sent: Wednesday, November 28, 2007 10:15 AM
To: McCarty, Cathleen; Helton, Kelsey; Miller.Scott@epamail.epa.gov
Cc: joanna.moreno@adventusgroup.com; 'Brouman, Mitch (Pittsburgh) NA'; Mike.Slenska@hanson.biz; 'Council, Greg'; dfoster@keyenvir.com; tracy.bellehumeur@adventusgroup.com; nmisquitta@keyenvir.com; 'Erickson, Jim'
Subject: RE: GNV FDEP comments

Hi Cathleen - yesterday I sent to you via FedEx signed originals of the attached documents. Dale Foster from KEY Environmental will complete the distribution to all other parties. We are still planning to conduct the field scale pilot test during the week of January 20-25, 2008 so hopefully our response and corresponding modifications to the documents meet with your acceptance and approval. In a few days Greg Council from GeoTrans will contact you to follow up on any outstanding issues.

Thank you very much for your time and assistance.

Jim Mueller, Ph.D.
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"North American Environmental Remediation Product Innovation of the Year" from Frost & Sullivan, May 2007
"Innovation Award for Technology 2007" from ICU, May 2007

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