

Florida Department of Environmental Protection

Memorandum

-TO: Kelsey Helton, P.G., Hazardous Waste Cleanup Section

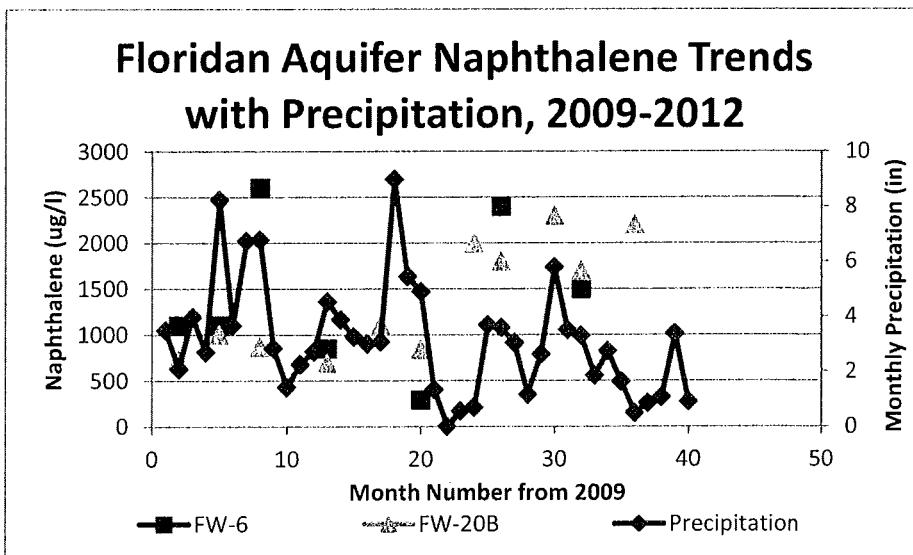
THROUGH: Brian Dougherty, Administrator
 Program & Technical Support Section, BWC 7/11/2012
 X *[Signature]*

FROM: Zoe Kulakowski, Professional Geologist
 Program & Technical Support Section, BWC 7/9/2012
 X ZPK

DATE: July 9, 2012

SUBJECT: Cabot Carbon/Koppers, Gainesville, Alachua County
 2011 Second Semi-Annual Groundwater Monitoring Report
 Site ID: WC-SF 000000007

As requested, I have reviewed the referenced document prepared by Field & Technical Services, LLC for Beazer East, Inc. for the referenced site. No significant changes from previous water level and groundwater quality events were found. However, in regard to the page 22 of 444 comment that benzene and naphthalene at FW-20B have increased since Third Quarter 2011, the concentrations in the Floridan Aquifer increased when the monthly rainfall decreased. See the naphthalene concentration plot below for FW-6 and FW-20B.



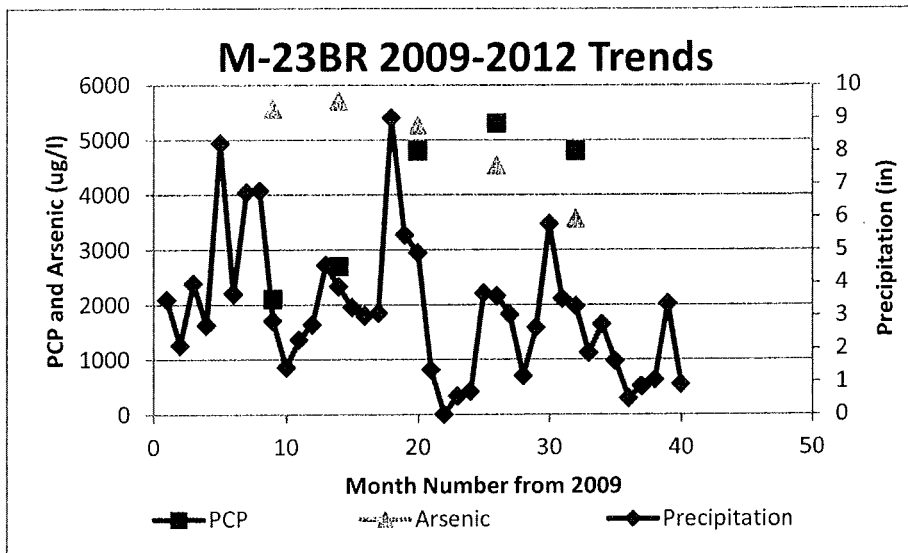
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July 9, 2012

Page 2

For M-23BR, the arsenic declines with a reduction in rainfall (decreasing oxygen recharge), whereas the pentachlorophenol concentration increases (less dilution from the rainfall recharge).



The data of this report continue to support the need for the following:

- (1) Floridan Aquifer groundwater recovery at FW-16B (for the naphthalene migrating off property to the east),
- (2) On property vertical delineation of the Floridan Aquifer plume in the FW-12B/FW-27B area
- (3) For the FW-12B/FW-37B plume, a down gradient "C" depth Floridan Westbay System well between FW-22C and FW-23C (550 feet apart and potentially missing the plume migrating between them), and
- (4) Hawthorn and Floridan Aquifer background wells for groundwater elevation and water quality data.

/zpk