



July 15, 2014

United States Environmental Protection Agency  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

Attention: Ms. Meredith Anderson  
Environmental Engineer

Re: **Quarterly Progress Report #7 April-June 2014**  
**Walter Coke**  
**3500 35<sup>th</sup> Avenue North**  
**Birmingham, Jefferson County, Alabama**  
**USEPA ID No. ALD 000 828 848**  
Terracon Project No. E1127096

Dear Ms. Anderson:

On behalf of Walter Coke, Inc. (Walter Coke), Terracon Consultants, Inc. (Terracon) has prepared Quarterly Progress Report #7 for the work completed April 1, 2014 to June 30, 2014 period for the above-referenced site. This progress report has been prepared in accordance with paragraph 53 of the Order on Consent with effective date of September 24, 2012.

## **PROGRESS REPORT (APRIL 1, 2014 THROUGH JUNE 30, 2014)**

### **Interim Measures**

- Hydraulic Control System was running during this reporting period. The volume of water recovered from April 1, 2014 through June 30, 2014 is 405,512 gallons.
- A PF50 filtration unit was installed in March 2014. The volume of water pumped this quarter was over four times the volume pumped last quarter. The filter system is still being tweaked to obtain optimal flow. In addition, other options for dealing with the iron fouling are being explored.
- Groundwater level measurements were collected from the monitoring wells in May 2014. The groundwater levels will be reported to EPA in the Annual Report which is due August 30, 2014.
- Groundwater samples were collected in May 2014. The analytical results from the groundwater samples collected during May will be submitted under separate cover.



### **Vapor Intrusion**

- On December 2, 2013, Walter Coke submitted a request to modify the Vapor Intrusion Characterization Work Plan (VICWP, Revision 2.0) to update the VICWP to reflect EPA guidance and EPA's scientific determinations of air quality and risks in the vicinity of the properties subject to the VIWP. The EPA responded with a letter dated March 21, 2014, which outlined the response to the December 2, 2013 request. Among other things, EPA's letter indicated that Walter Coke's proposed modification demonstrated that revisions to the VIWP are warranted, that a 0.03 attenuation factor should be applied to soil gas monitoring results for screening and that future decision-making related to sampling above applicable screening values will be based on multiple lines of evidence.
- Walter Coke submitted a VICWP (Revision 2.0) dated June 20, 2014 addressing EPA's comments on March 21, 2014. Walter Coke will submit the VIC Report within 30-days of receipt of EPA's approval of the VICWP (Revision 2.0).

### **Corrective Measures**

- Soil sampling for CMS SMA 5 was conducted on June 16 and 17, 2014. The results from these soil samples will be presented in the CMS SMA 5 due September 24, 2014.

### **PROJECTED WORK FOR NEXT REPORTING PERIOD (APRIL 1, 2014 THROUGH JUNE 30, 2014)**

#### **Interim Measures**

- Continue operation and maintenance of the hydraulic control system.
- Continue to tweak the iron filtration system to achieve optimal flow.
- Continue to explore other options to improve recovery system.
- The Annual Groundwater Report will be prepared and submitted to EPA in August 2014.

### **Vapor Intrusion**

- The Annual VI Report will be prepared and submitted to EPA within 30 days of receipt of the approval of the VIWP Revision 2.0.

### **Corrective Measures**

- The CMS for SMA 5 will be submitted by September 24, 2014.

**Quarterly Progress Report #7 April-June 2014**

Walter Coke ■ Birmingham, Alabama

April 15, 2014 ■ Terracon Project No. E1127096



**CLOSING**

If you should have any questions, please do not hesitate to contact us at (205) 942-1289.

Sincerely,

**Terracon Consultants, Inc.**

Terrell W. Rippstein, AL-PG#8

Principal Geologist

Cc: Mr. Don Wiggins – Walter Coke  
Mr. Dan Gucza – Walter Energy  
ADEM