



April 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 #6 January-March 2014**
Walter Coke
3500 35th 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 #6 for the work completed January 1, 2014 to March 31, 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 (JANUARY 1, 2014 THROUGH MARCH 31, 2014)

Interim Measures

- Hydraulic Control System was running during this reporting period. The volume of water recovered from January 1, 2014 through March 31, 2014 is 93,112 gallons.
- A PF50 filtration unit was installed on Friday, March 14th to remove iron which had been precipitating into the pumps and lines and causing a reduced groundwater flow through the system. Approximately 40,000 gallons of water was captured during the last two weeks of March after the iron filtration system was installed. The filter system is still being tweaked to obtain optimal flow.
- Groundwater level measurements were collected from the monitoring wells in February 2014. The groundwater levels will be reported to EPA in the Quarterly and Annual Report.



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Geotechnical



Environmental



Construction Materials



Facilities

- Groundwater samples were collected in February 2014. The analytical results from the groundwater samples collected during February will be submitted under separate cover in the Interim Measures Quarterly Report which will be submitted to EPA in April 2014.

Vapor Intrusion

- The fourth quarter of soil vapor monitoring was conducted on February 19 and 20, 2014.
- During the fourth quarterly sampling, 24-hour air monitoring was conducted at one residential crawlspace, 2 soil vapor ports on the residential property were sampled, 2 soil vapor ports on adjacent Walter Coke property were sampled, and 24-hour air monitoring was conducted of localized ambient air.
- The results for the February 2014 sampling event will be presented to EPA in April 2014.
- On December 2, 2013, Walter Coke submitted a request to modify the Vapor Intrusion Characterization Work Plan (VIWP, Revision 2.0) to update it 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. Accordingly, Walter Coke is in discussions with the EPA and preparing to cooperate with the agency to revise the VIWP.

Corrective Measures

- Walter Coke submitted the CMS SMA 1 – BTF Process Area and Sewers (Revision 1.0) on January 24, 2014, based on EPA's final comments for the CMS SMA 1 dated November 19, 2013.
- Walter Coke submitted the CMS for SMA 4 to the EPA on March 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.
- IM Quarterly Report will be prepared and submitted to EPA in July 2014.
- Quarterly groundwater monitoring will be conducted in May 2014.

Vapor Intrusion

- The fourth quarter monitoring results will be submitted to EPA in April 2014.
- The Annual VI Report will be prepared and submitted to EPA following the revisions to the VIWP that EPA has determined are warranted based on Walter Coke's proposed VIWP modification.

Corrective Measures

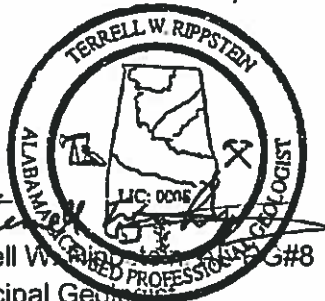
- Currently, there are no deliverables due during the April 2014 through June 2014 timeframe. The CMS for SMA 5 is due September 24, 2014.

CLOSING

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

Sincerely,

Terracon Consultants, Inc.



Terrell W. Ripstein
Principal Geologist

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

