

Beazer

BEAZER EAST, INC. C/O THREE RIVERS MANAGEMENT, INC.
ONE OXFORD CENTRE, SUITE 3000, PITTSBURGH, PA 15219-6401

October 30, 2006

Ms. Amy McLaughlin
Remedial Project Manager
United States Environmental Protection Agency
Region IV, Superfund North Florida Section
61 Forsyth Street, SW
Atlanta, GA 30303

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ALACHUA COUNTY
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PROTECTION
DEPARTMENT

**RE: Five-Year Review Report – April 2006
Recommendation #9–Redevelopment/Sampling of Surficial Aquifer Wells
Cabot Carbon/Koppers Superfund Site in Gainesville, Florida**

Dear Ms. McLaughlin:

Beazer East, Inc. (Beazer) is writing this letter in response to the EPA recommendation #9 in the *Second Five-Year Review Report for Cabot Carbon/Koppers Superfund Site*, dated April 4, 2006 (Review Report) conducted by the U.S. Army Corps of Engineers (USACOE) on behalf of the United States Environmental Protection Agency (EPA). Beazer's response to the Review Report is contained in our letter to the EPA dated June 2, 2006. Pursuant to recommendation #9 in Table 13 of the Review Report and per the discussion concerning this issue at our meeting with the EPA on October 2, 2006, enclosed with this letter is Figure 1 showing the locations of Surficial Aquifer monitoring wells at the Cabot Carbon/Koppers Superfund Site (the Site) and Table 1 listing construction details and proposed sampling status for the wells. This evaluation was performed for all potential Surficial Aquifer wells at the Site to address Recommendation #9; however, Beazer believes that the final list of wells proposed for redevelopment and sampling on the Cabot Carbon portion of the Site would likely be addressed by Cabot Carbon.

Monitoring wells were grouped into three categories for Recommendation #9: 1) Wells that are not proposed for redevelopment and sampling; 2) Wells that are proposed for redevelopment, but no sampling; and 3) Wells that are proposed for redevelopment and sampling (Figure 1 and Table 1). Wells not proposed for redevelopment and sampling include: 1) Water-level piezometers completed adjacent to the extraction wells; 2) Monitoring wells completed in source areas; and 3) Monitoring wells in close

proximity to one another. Piezometers completed adjacent to the extraction wells were designed for water-level monitoring and do not provide useful information on plume concentration and distribution. Monitoring wells completed in the former source areas are not representative of the dissolved-phase plume for the Surficial Aquifer and are likely impacted by residual NAPL droplets and sheens in the well. Monitoring wells completed in close proximity of another well selected for monitoring do not provide significant additional data for characterizing the dissolved-phase plume distribution.

Wells that are proposed for redevelopment, but will not be sampled are all the extraction wells (EW-1 through EW-3, EW-5, EW-6, EW-8 through EW-11, and EW-13 through EW-17). Extraction wells are routinely sampled as part of the O&M program for the hydraulic-containment system. Groundwater obtained from an extraction well represents a volume-averaged sample within the capture radius of the well. A volume-averaged sample would be inconsistent with point samples obtained from the other monitoring wells. Redevelopment of the extraction wells will likely improve the groundwater extraction performance of the hydraulic-containment system and will, therefore, be performed under this program. The redevelopment of the extraction wells will also help to address Recommendation #1 of the Review Report.

With the exception of the wells described above, all remaining Surficial Aquifer monitoring wells are proposed for redevelopment and sampling under this program. Consistent with the June 2, 2006 letter, Beazer proposes to sample 26 monitoring wells on the Koppers portion of the Cabot Carbon/Koppers Superfund Site. Monitoring wells on the Cabot Carbon portion of the Site are not the responsibility of Beazer.

The sampling of the 26 wells discussed above will be performed as a one-time event to obtain a current snap-shot of the Surficial Aquifer constituent plume concentration and distribution. Beazer is currently performing an evaluation of the hydraulic-containment system (see Recommendation #1 in Review Report) to address issues associated with complete plume capture. It is anticipated that additional extraction wells will be added to the system to help ensure a more complete capture of constituents from the Koppers portion of the Site. Consistent with this evaluation, Beazer will propose a revised long-term monitoring program for the Surficial Aquifer to evaluate the performance of this improved system.

Ms. Amy McLaughlin

October 30, 2006

Page 3

Beazer is prepared to proceed with the work described in this letter, once approval is received from the EPA. If you should have any questions or require additional information, please contact me at 412-208-8867.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Slenska", with a long horizontal flourish extending to the right.

Michael Slenska, P.E.
Environmental Manager

Attachments

Cc: Kelsey Helton, FDEP
John Mousa, ACEPD
Brett Goodman, GRU
Jill Blundon
Jim Erickson, GeoTrans

Explanation

- M-1 ● Surficial well on Beazer portion of Site--redevelop and sample
- ESE-3 ● Surficial well on Cabot Carbon portion of Site--redevelop and sample
- Surficial well--no redevelopment and sample
- ◆ Extraction well--redevelop, with no sample

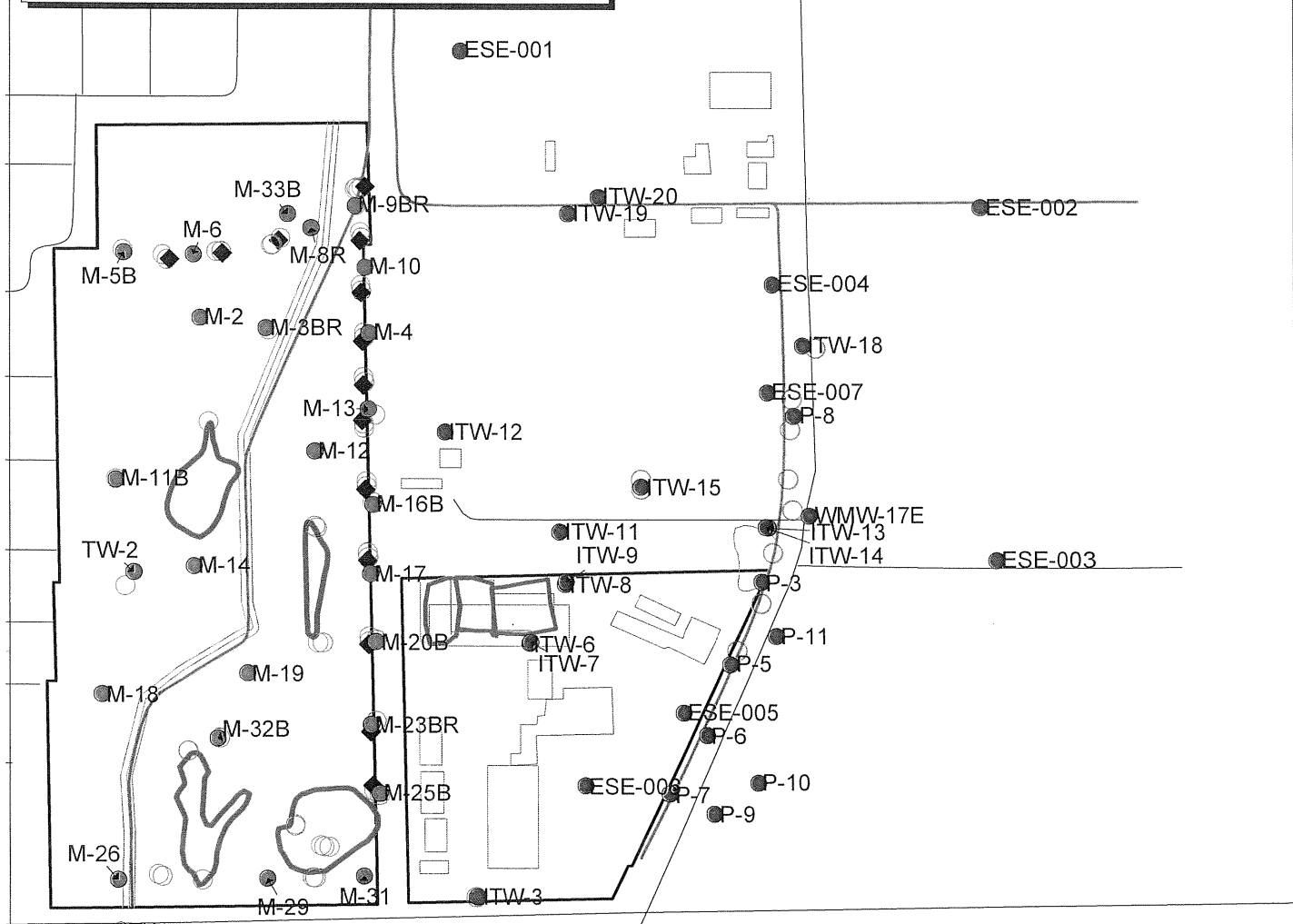
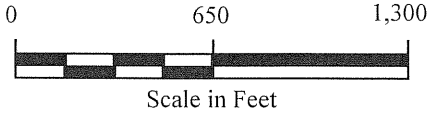


Figure 1. Locations of Surficial Aquifer wells proposed for sampling and redevelopment at the Cabot Carbon/Koppers Superfund Site.



Table 1. Surficial Aquifer well redevelopment and sampling status for the Cabot Carbon/ Koppers Superfund Site.

WELL ID	SAMPLE (Y/N)	Sample/No Sample Justification	Property Location	X_COORD	Y_COORD	TOTAL DEPTH (FT)	TOP OF SCREEN	BOTTOM OF SCREEN	WELL DIAMETER (IN)
ESE-001	Y		Cabot	2659601.00	255084.00	23.36	6.50	21.20	
ESE-002	Y		Cabot	2661654.63	254467.44	25.03	8.00	23.00	
ESE-003	Y		Cabot	2661715.79	253070.11	30.08	9.00	29.00	
ESE-004	Y		Cabot	2660830.38	254160.32	27.10	6.50	21.50	
ESE-005	Y		Cabot	2660475.51	252465.87	29.90	9.50	29.50	
ESE-006	Y		Cabot	2660090.81	252177.37	29.72	7.50	27.50	
ESE-007	Y		Cabot	2660810.13	253732.60	25.07	7.50	22.50	
EW-1	N	Extraction Well	Beazer	2658454.00	254260.00				
EW-10	N	Extraction Well	Beazer	2659213.00	253762.00				
EW-11	N	Extraction Well	Beazer	2659209.00	253623.00				
EW-13	N	Extraction Well	Beazer	2659222.00	253349.00				
EW-14	N	Extraction Well	Beazer	2659228.00	253068.00				
EW-15	N	Extraction Well	Beazer	2659232.00	252736.00				
EW-16	N	Extraction Well	Beazer	2659239.00	252390.00				
EW-17	N	Extraction Well	Beazer	2659246.00	252178.00				
EW-2	N	Extraction Well	Beazer	2658662.00	254284.00				
EW-3	N	Extraction Well	Beazer	2658884.00	254335.00				
EW-5	N	Extraction Well	Beazer	2659221.00	254548.00				
EW-6	N	Extraction Well	Beazer	2659201.00	254334.00				
EW-8	N	Extraction Well	Beazer	2659205.00	254128.00				
EW-9	N	Extraction Well	Beazer	2659210.00	253935.00				
ITW-1	Y		Beazer	2658246.00	251597.00	23.68	15.50	25.50	
ITW-11	Y		Cabot	2659990.24	253181.23	15.74	6.00	16.00	
ITW-12	Y		Cabot	2659535.00	253577.00	22.35	6.50	26.50	
ITW-13	Y	Investigate Lagoon	Cabot	2660812.80	253198.48	33.00	23.00	33.00	
ITW-14	Y	Investigate Lagoon	Cabot	2660802.90	253200.21	17.00	5.00	15.00	
ITW-15	Y		Cabot	2660311.19	253359.92	32.15	20.00	30.00	
ITW-15A	N	Paired Well	Cabot	2660306.97	253387.13	30.00	20.00	30.00	
ITW-16	N	Within 12 ft ITW-15	Cabot	2660307.40	253349.47	21.00	12.50	22.50	
ITW-17	N	Within 60 ft WMV-17E-15	Cabot	2660905.53	253267.29	22.00	21.00	31.00	
ITW-18	Y		Cabot	2660948.68	253919.04	31.30	12.00	32.00	
ITW-19	Y	UG Canal	Cabot	2660025.68	254440.79	29.00	11.00	31.00	
ITW-2	N	Paired with ITW-1	Beazer	2658257.00	251597.00	14.72	5.50	15.50	
ITW-20	Y		Cabot	2660146.00	254506.00	30.00	11.00	31.00	

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ITW-22	N	Within 35 ft MW-13	Cabot	2659258.00	253644.00	30.54	3.00	13.00	
ITW-23	N	Within 70 ft MW-9R & DG	Cabot	2659188.00	254542.00	26.50	21.50	26.50	
ITW-24	N	Within 9 ft of ITW-24	Cabot	2659180.62	254537.00	20.00	5.00	15.00	
ITW-3	Y		Cabot	2659656.43	251737.02	22.05	15.50	25.50	
ITW-4	N	Within 8 ft ITW-3; Shall	Cabot	2659650.24	251737.50	17.12	5.00	15.00	
ITW-5	N	Within 20 ft MW-23AR	Beazer	2659259.00	252432.00	23.79	19.00	24.00	
ITW-6	Y	Investigate Lagoon GW	Cabot	2659869.84	252741.08	27.75	18.50	28.50	
ITW-7	Y	Investigate Lagoon GW	Cabot	2659874.20	252745.97	18.70	8.50	18.50	
ITW-8	Y	Investigate Lagoon GW	Cabot	2660012.26	252974.12	27.97	18.50	28.50	
ITW-9	Y	Investigate Lagoon GW	Cabot	2660016.03	252984.78	30.24	8.00	18.00	
M-1	N	Source Well	Beazer	2658603.00	253616.00	21.00	11.00	21.00	2
M-10	Y		Beazer	2659222.00	254228.00	13.00	3.00	13.00	2
M-11A	N	Paired Well	Beazer	2658239.63	253389.65				
M-11B	Y		Beazer	2658244.00	253388.00	23.50	18.50	23.50	2
M-12	Y		Beazer	2659024.00	253501.00	13.00	3.00	13.00	2
M-13	Y		Beazer	2659232.90	253667.92				
M-14	Y		Beazer	2658549.00	253046.00	14.00	4.00	14.00	2
M-15A	N	Paired Well	Beazer	2659021.51	253203.59				
M-15B	N	Source Well	Beazer	2659028.00	253196.00	23.50	18.50	23.50	2
M-16A	N	Paired Well	Beazer	2659248.00	253297.00	13.00	3.00	13.00	2
M-16B	Y		Beazer	2659250.00	253289.00	21.50	16.50	21.50	2
M-17	Y		Beazer	2659240.00	253016.00	13.00	3.00	13.00	2
M-18	Y		Beazer	2658189.00	252538.00	13.00	3.00	13.00	2
M-19	Y		Beazer	2658757.84	252622.38	13.00			
M-2	Y		Beazer	2658573.61	254028.61				
M-20A	N	Paired Well	Beazer	2659260.00	252754.00	13.00	3.00	13.00	2
M-20B	Y		Beazer	2659260.00	252747.00	22.00	17.00	22.00	2
M-21A	N	Paired Well	Beazer	2658522.00	252315.00	13.00	3.00	13.00	2
M-21B	N	Source Well	Beazer	2658519.00	252313.00	22.50	17.50	22.50	2
M-22A	N	Paired Well	Beazer	2659050.00	252742.00	15.00	5.00	15.00	2
M-22B	N	Source Well	Beazer	2659032.00	252742.00	27.00	22.00	27.00	2
M-23AR	N	Paired Well	Beazer	2659243.00	252413.00	13.00	3.00	13.00	2
M-23BR	Y		Beazer	2659242.00	252420.00	23.50	18.50	23.50	2
M-24A	N	Paired Well	Beazer	2658943.00	252017.00	15.00	5.00	15.00	2

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M-24B	N	Source Well	Beazer	2658944.00	252023.00	25.50	20.50	25.50	2
M-25A	N	Paired Well	Beazer	2659272.00	252140.00	13.00	3.00	13.00	2
M-25B	Y		Beazer	2659275.00	252146.00	23.00	18.00	23.00	2
M-26	Y		Beazer	2658249.00	251803.00	13.00	3.00	13.00	2
M-27A	N	Paired Well	Beazer	2658403.00	251826.00	13.00	3.00	13.00	2
M-27B	N	Sufficient wells in area	Beazer	2658419.00	251819.00	20.00	15.00	20.00	2
M-28R	N	Source Well	Beazer	2658576.00	251805.00	13.00	3.00	13.00	2
M-29	Y		Beazer	2658834.00	251809.00	13.00	3.00	13.00	2
M-30A	N	Paired Well	Beazer	2659010.00	251814.00	13.00	3.00	13.00	2
M-30B	N	Sufficient wells in area	Beazer	2659019.00	251813.00	23.00	18.00	23.00	2
M-31	Y		Beazer	2659212.00	251818.00	13.00	3.00	13.00	2
M-32AR	N	Paired Well	Beazer	2658646.00	252365.00	13.00	3.00	13.00	2
M-32B	Y		Beazer	2658640.00	252364.00	23.00	18.00	23.00	2
M-33B	Y		Beazer	2658919.00	254440.00	27.30	22.30	27.30	2
M-3A	N	Paired Well	Beazer	2658841.00	253981.00	15.00	5.00	15.00	2
M-3BR	Y		Beazer	2658833.00	253988.00	22.00	17.00	22.00	2
M-4	Y		Beazer	2659236.00	253968.00	15.00	5.00	15.00	2
M-5A	N	Paired Well	Beazer	2658268.63	254295.93	16.00			
M-5B	Y		Beazer	2658276.00	254287.00	26.50	21.50	26.50	2
M-6	Y		Beazer	2658548.00	254279.00	15.00	5.00	15.00	2
M-7A	N	Paired Well	Beazer	2658853.00	254316.00	13.00	3.00	13.00	2
M-7B	N	UG M-33B	Beazer	2658858.00	254319.00	21.50	16.50	21.50	2
M-8R	Y		Beazer	2659011.00	254384.00	15.00	5.00	15.00	2
M-9AR	N	Paired Well	Beazer	2659189.00	254467.00	15.00	5.00	15.00	2
M-9BR	Y		Beazer	2659183.00	254471.00	26.50	21.50	26.50	2
OW-1	N	Source Well	Beazer	2659053.00	251936.00	23.40	14.50	24.50	2
OW-2	N	Source Well	Beazer	2659073.00	251935.00	25.20	15.00	25.00	2
P-10	Y		Cabot	2660769.70	252188.87	14.76	10.00	15.00	
P-11	Y		Cabot	2660842.76	252769.63	11.90	10.00	15.00	
P-2	N	Within 60 ft P-8 DG	Cabot	2660896.40	253585.74	9.90	5.18	10.18	
P-3	Y		Cabot	2660785.46	252984.44	9.75	5.00	10.00	
P-4	N	Shallow piez next drain	Cabot	2660779.98	252898.61	10.00	5.00	10.00	
P-5	Y		Cabot	2660661.95	252657.77	11.40	6.65	11.65	
P-6	Y		Cabot	2660568.59	252376.75	12.40	7.50	12.50	

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WELL ID	SAMPLE (Y/N)	Sample/No Sample Justification	Property Location	X COORD	Y COORD	TOTAL DEPTH (FT)	TOP OF SCREEN	BOTTOM OF SCREEN	WELL DIAMETER (IN)
P-7	Y		Cabot	2660419.52	252144.81	12.40	7.50	12.50	
P-8	Y		Cabot	2660913.75	253640.76	9.83	5.00	10.00	
P-9	Y		Cabot	2660596.44	252065.60	10.70	10.00	15.00	
PW-1	N	Sourcel/NAPL Well	Beazer	2659041.00	251941.00	24.85	4.30	24.30	6
PZ-10A	N	EW-Well Piezometer	Beazer	2659217.00	253772.00	27.10			
PZ-10B	N	EW-Well Piezometer	Beazer	2659213.00	253792.00	27.16			
PZ-11A	N	EW-Well Piezometer	Beazer	2659214.00	253609.00	29.90			
PZ-11B	N	EW-Well Piezometer	Beazer	2659215.00	253592.00	29.75			
PZ-13A	N	EW-Well Piezometer	Beazer	2659223.00	253360.00	27.10			
PZ-13B	N	EW-Well Piezometer	Beazer	2659223.00	253380.00	27.20			
PZ-14A	N	EW-Well Piezometer	Beazer	2659229.00	253079.00	27.50			
PZ-14B	N	EW-Well Piezometer	Beazer	2659227.00	253098.00	26.50			
PZ-15A	N	EW-Well Piezometer	Beazer	2659234.00	252747.00	28.25			
PZ-15B	N	EW-Well Piezometer	Beazer	2659233.00	252767.00	28.25			
PZ-17A	N	EW-Well Piezometer	Beazer	2659251.00	252158.00	29.00			
PZ-1A	N	EW-Well Piezometer	Beazer	2658442.00	254258.00	28.40			
PZ-1B	N	EW-Well Piezometer	Beazer	2658425.00	254277.00	28.00			
PZ-2A	N	EW-Well Piezometer	Beazer	2658656.00	254291.00	27.40			
PZ-2B	N	EW-Well Piezometer	Beazer	2658637.00	254290.00	27.45			
PZ-3A	N	EW-Well Piezometer	Beazer	2658891.00	254343.00	26.25			
PZ-5A	N	EW-Well Piezometer	Beazer	2659208.00	254544.00	27.80			
PZ-5B	N	EW-Well Piezometer	Beazer	2659196.00	254535.00	25.00			
PZ-6A	N	EW-Well Piezometer	Beazer	2659207.00	254344.00	28.10			
PZ-6B	N	EW-Well Piezometer	Beazer	2659202.00	254366.00	28.40			
PZ-8A	N	EW-Well Piezometer	Beazer	2659206.00	254135.00	30.30			
PZ-8B	N	EW-Well Piezometer	Beazer	2659203.00	254156.00	27.60			
PZ-9A	N	EW-Well Piezometer	Beazer	2659215.00	253948.00	31.50			
PZ-9B	N	EW-Well Piezometer	Beazer	2659216.00	253968.00	31.35			
SUMP-1	N	Horizontal Dm Sump	Cabot	2660903.25	253706.73				
SUMP-2	N	Horizontal Dm Sump	Cabot	2660887.50	253390.56				
SUMP-3	N	Horizontal Dm Sump	Cabot	2660827.23	253098.58				
SUMP-4	N	Horizontal Dm Sump	Cabot	2660684.78	252710.96				
TW-1	N	Within 70 ft TW-2	Beazer	2658275.70	252966.86	23.00	3.00	23.00	2
TW-2	Y		Beazer	2658312.23	253021.88	23.00	3.00	23.00	2

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WMW-17E	Y		Cabot	2660973.78	253245.51	31.20	9.00	29.00	
WMW-18E	N	Within 45 ft ITW-18	Cabot	2660998.73	253908.11	25.58	9.00	29.00	