

Beazer

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

November 17, 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

RECEIVED
ALACHUA COUNTY
ENVIRONMENTAL

NOV 17 2006

PROTECTION
DEPARTMENT

**RE: Five-Year Review Report – April 2006
Recommendation #6–Reevaluation of Site Stratigraphy
Cabot Carbon/Koppers Superfund Site in Gainesville, Florida**

Dear Ms. McLaughlin:

Beazer East, Inc. (Beazer) is writing this letter as a follow-up to the EPA recommendation #6 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, 2006¹. Beazer's proposed action regarding this issue was detailed in the response as follows:

“..Beazer proposes that the Site stratigraphy can be reevaluated utilizing the information obtained during the recent Floridan Aquifer well drilling. Beazer can reinterpret the new and old information regarding Site stratigraphy. This work can be accomplished by the proposed 12-01-06 Milestone Date.”

Pursuant to recommendation #6 in Table 13 of the Review Report and per our discussion concerning this issue at our meeting with the EPA on August 1, 2006, enclosed with this letter are Figures 1 through 6 showing elevation contours for the tops and bottoms of the Hawthorn Group (HG) Upper, Middle and Lower Clay units at the Cabot Carbon/Koppers Superfund Site (the Site). The interpretation for the tops and bottoms of these clay units were modified slightly from those used in the development of the Site Model (GeoTrans, October 5, 2004) based on more recent hydrogeologic data for the Site. Hydrogeologic data used in the development of these surfaces included:

¹ Beazer's June 2, 2006 letter provided a response and proposed actions regarding each of the 13 Recommendations included in the April 4, 2006 Five Year Review Report. However, Beazer's June 2, 2006 response letter was formatted based on a draft Recommendations Table provided by EPA. This draft Recommendations Table was modified and several recommendations were renumbered in its final format that was included in the April 4, 2006 Five Year Review Report. Therefore, Beazer's June 2, 2006 letter discusses the EPA Recommendation #6 under Beazer's Recommendation #4 response.

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- 1) Lithologic contact data from boreholes installed at and in the vicinity of the Site prior to 2005;
- 2) Electrical-resistivity data obtained from the 2004 Geohazards investigation and discussed in Appendix A of the GeoTrans Site Model report (October 5, 2004); and
- 3) Hydrogeologic data obtained from core collected during the recent Upper Floridan Aquifer monitoring well installation (GeoTrans, July 26, 2006).

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", followed by a long horizontal line extending to the right.

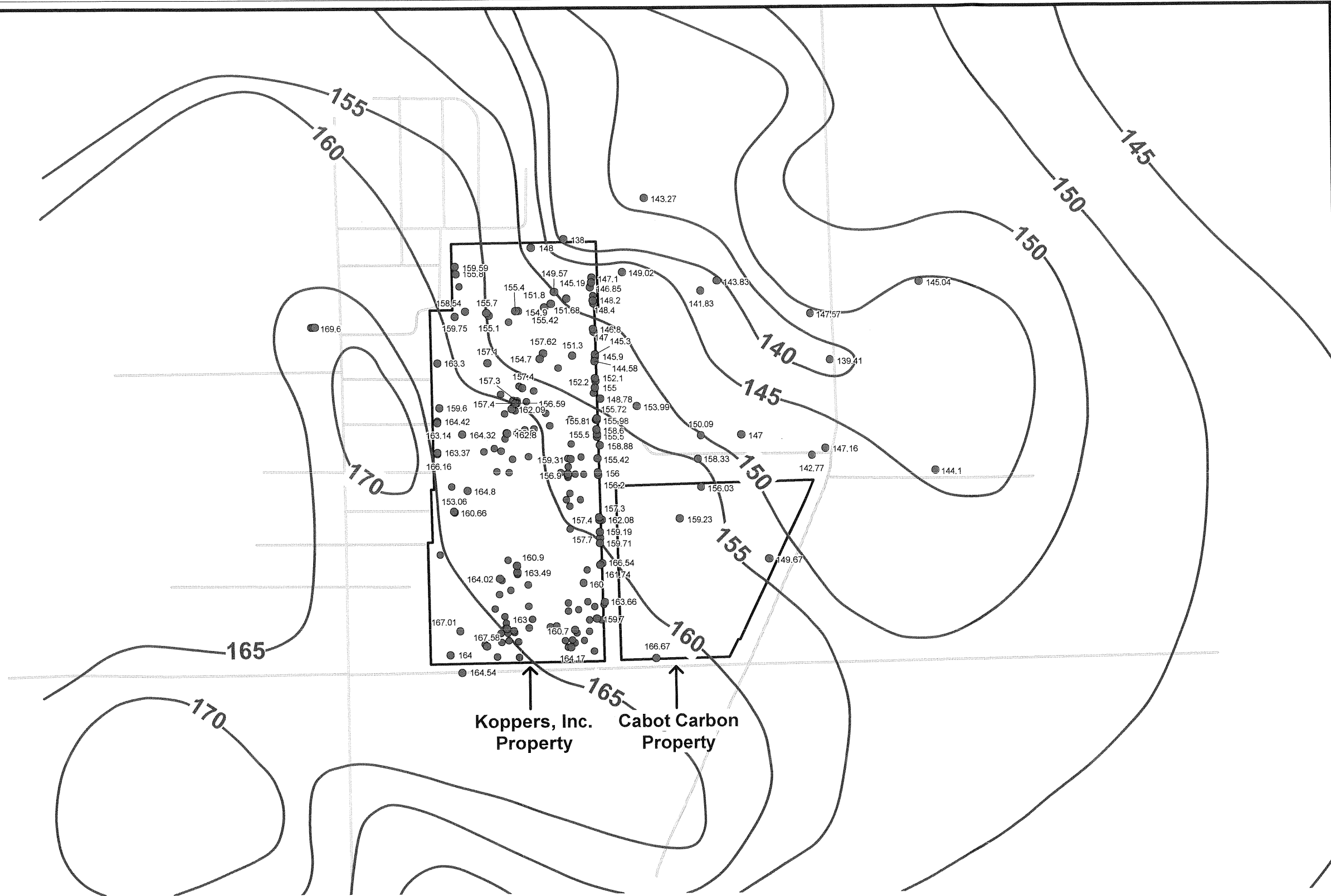
Michael Slenska, P.E.
Environmental Manager

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

References

GeoTrans 2004, Addendum 6: Groundwater Flow and Transport Model, Draft Report, Koppers, Inc. Site, Gainesville, Florida, October 5, 2004.

GeoTrans, 2006, Supplemental Upper Floridan Aquifer Monitoring Well Installation -- Addendum to the Floridan Aquifer Monitoring Plan, Koppers Inc. Site, Gainesville, Florida, July 26, 2006.



Explanation

- 167.01 Geologic boring location with select clay unit elevation in feet above msl.
- 160 Clay surface contour with elevation in feet above msl.

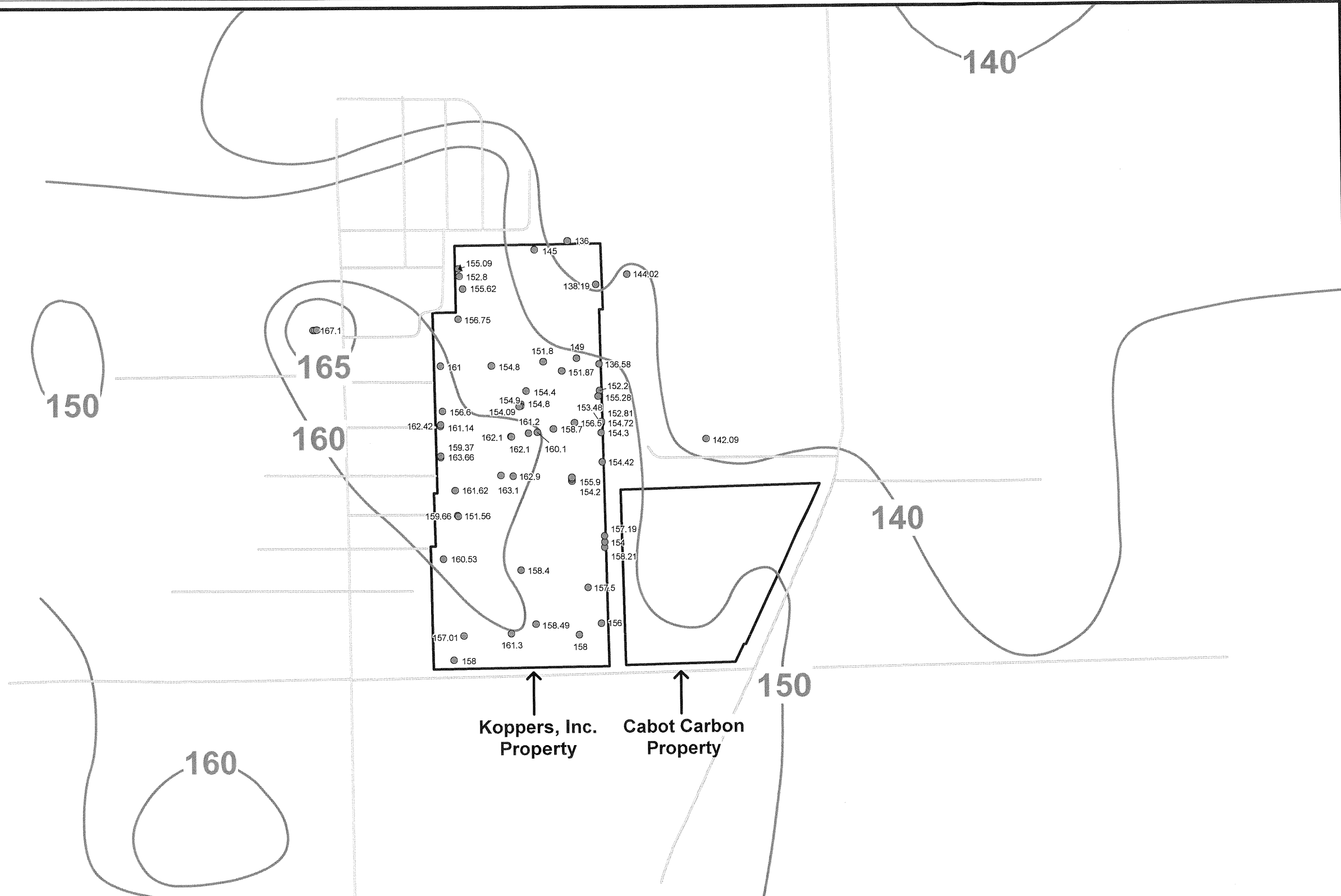
SCALE IN FEET

TITLE: Elevation contours for Hawthorn Group - top of upper clay unit

LOCATION: Gainesville, Florida

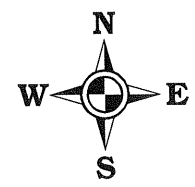
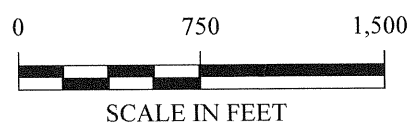
| | | |
|---------|-------------------------|---------------------|
| CHECKED | JRE | FIGURE: 1 |
| DRAFTED | DJB | |
| FILE | upper clay contours wor | |
| DATE | 10/31/06 | |

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Explanation

- 157.01 Geologic boring location with clay unit elevation in feet above msl.
- 160 Clay surface contour with elevation in feet above msl.



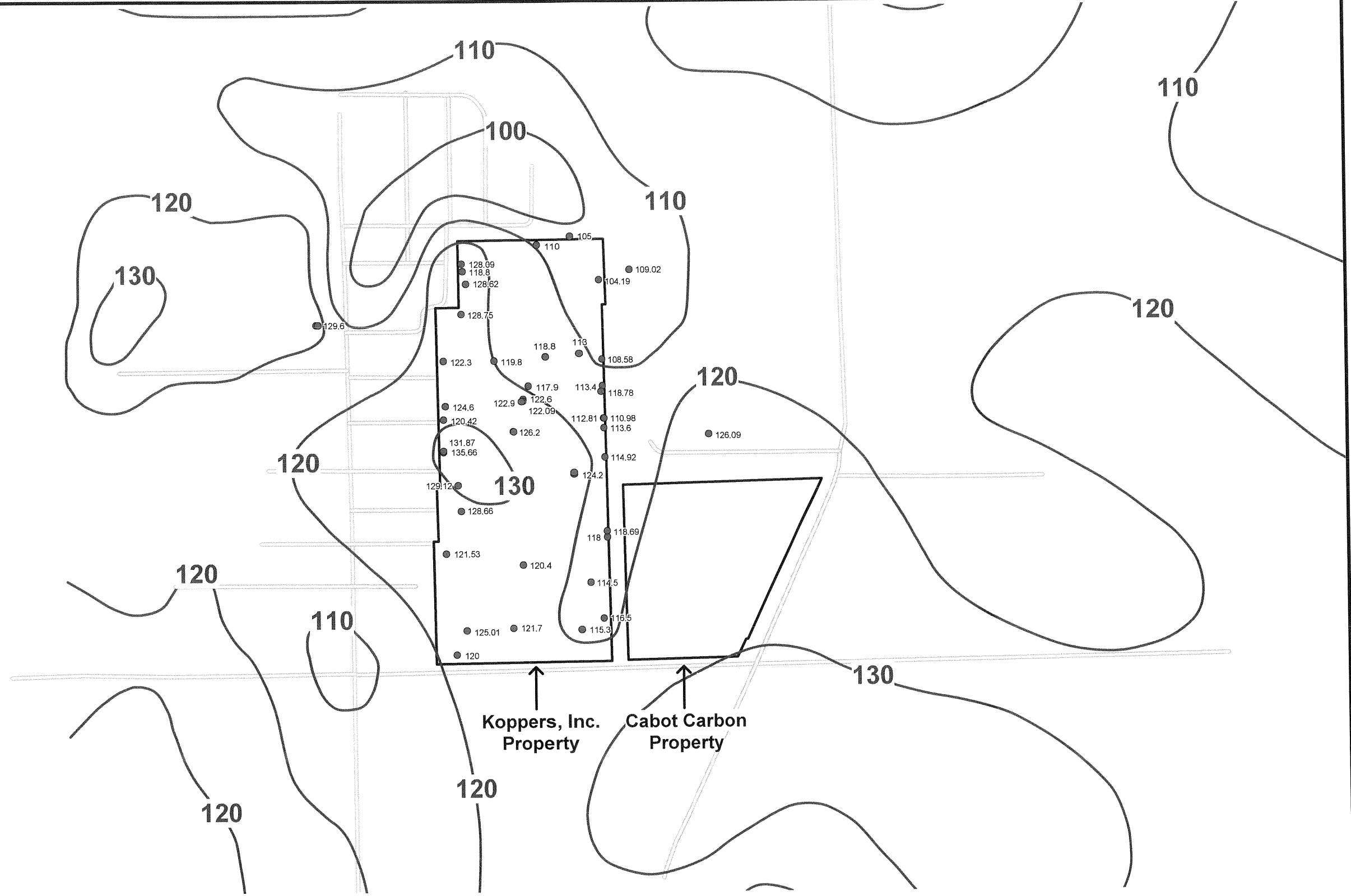
TITLE: Elevation contours for Hawthorn Group - bottom of upper clay unit

LOCATION: Gainesville, Florida



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| CHECKED | JRE | FIGURE: 2 |
| DRAFTED | DJB | |
| FILE | u m & l clay contours.wor | |
| DATE | 10/31/06 | |

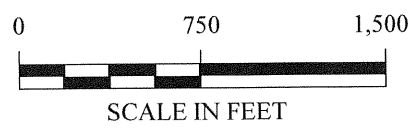
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Explanation

●^{125.01} Geologic boring location with clay unit elevation in feet above msl.

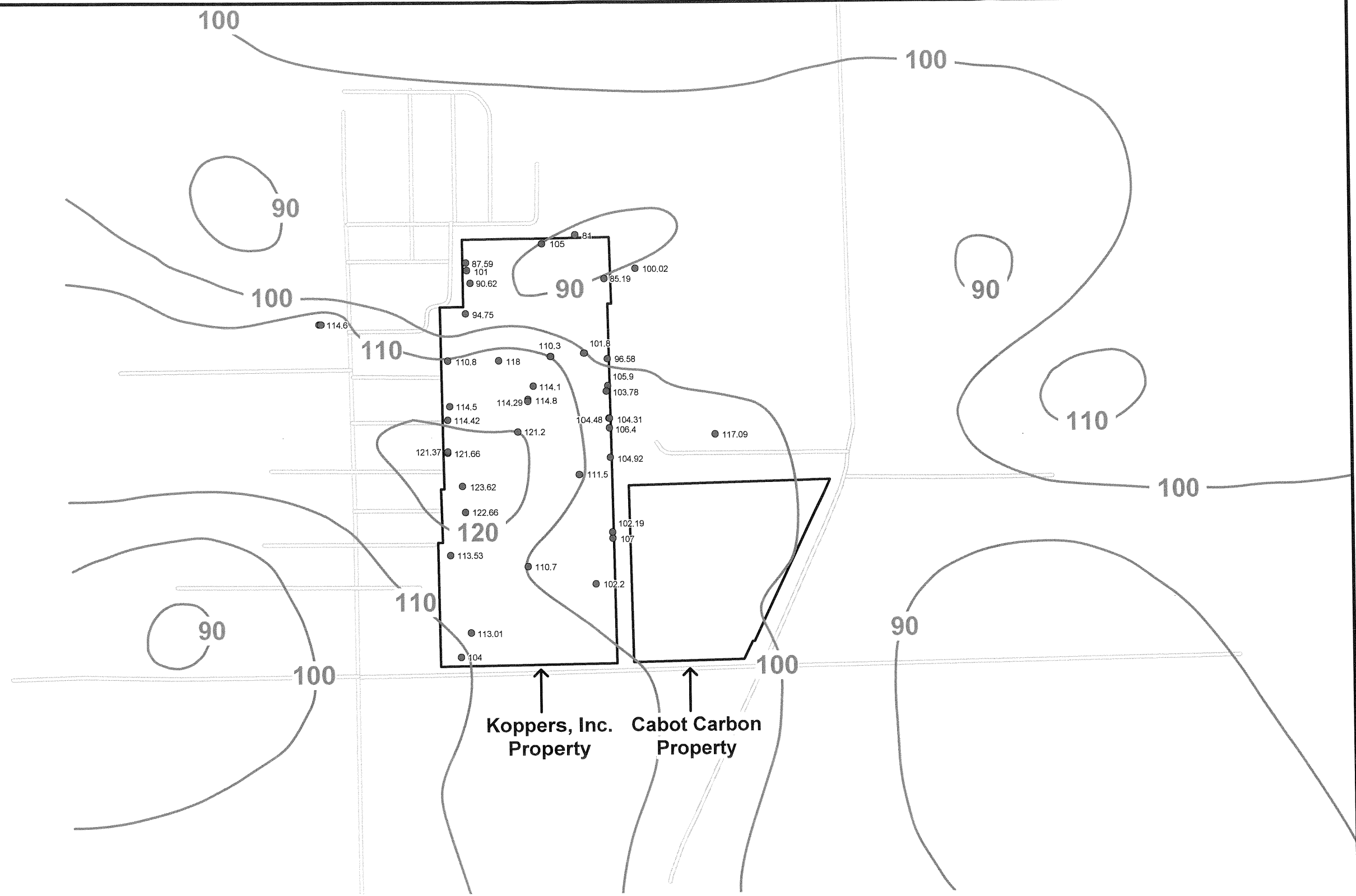
120 Clay surface contour with elevation in feet above msl.



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|---|---------------------------|---------------------|
| TITLE: Elevation contours for Hawthorn Group - top of middle clay unit | | |
| LOCATION: Gainesville, Florida | | |
| CHECKED | JRE | FIGURE: 3 |
| DRAFTED | DJB | |
| FILE | u m & l clay contours.wor | |
| DATE | 10/31/06 | |



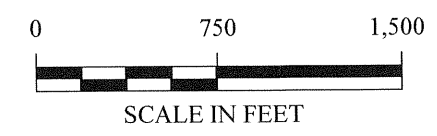
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Explanation

● 113.01 Geologic boring location with clay unit elevation in feet above msl.

120 Clay surface contour with elevation in feet above msl.



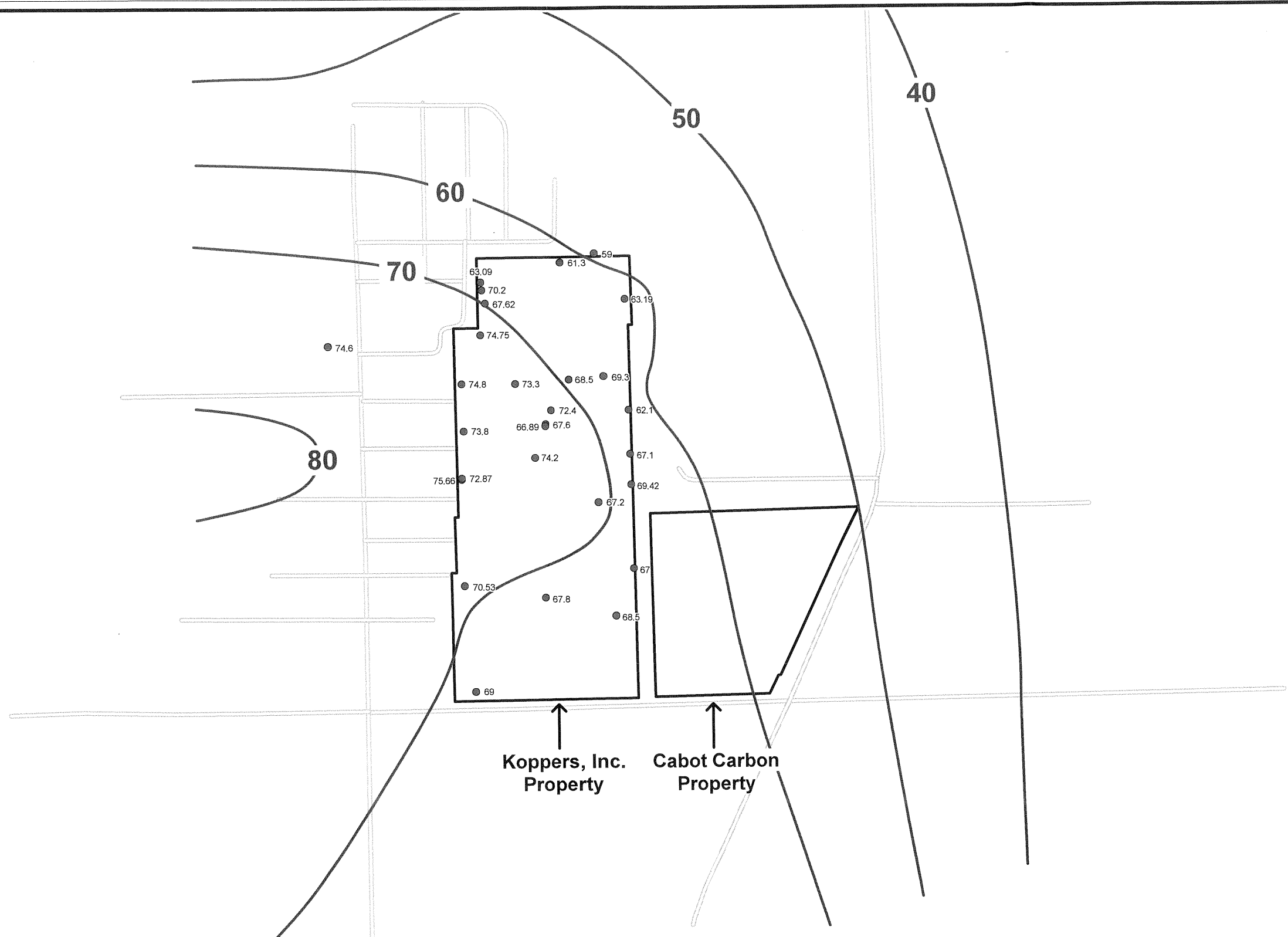
TITLE: Elevation contours for Hawthorn Group - bottom of middle clay unit

LOCATION: Gainesville, Florida



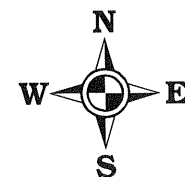
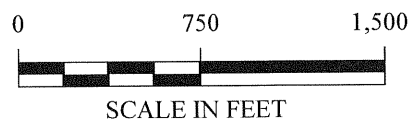
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| CHECKED | JRE | FIGURE: 4 |
| DRAFTED | DJB | |
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| DATE | 10/31/06 | |

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Explanation

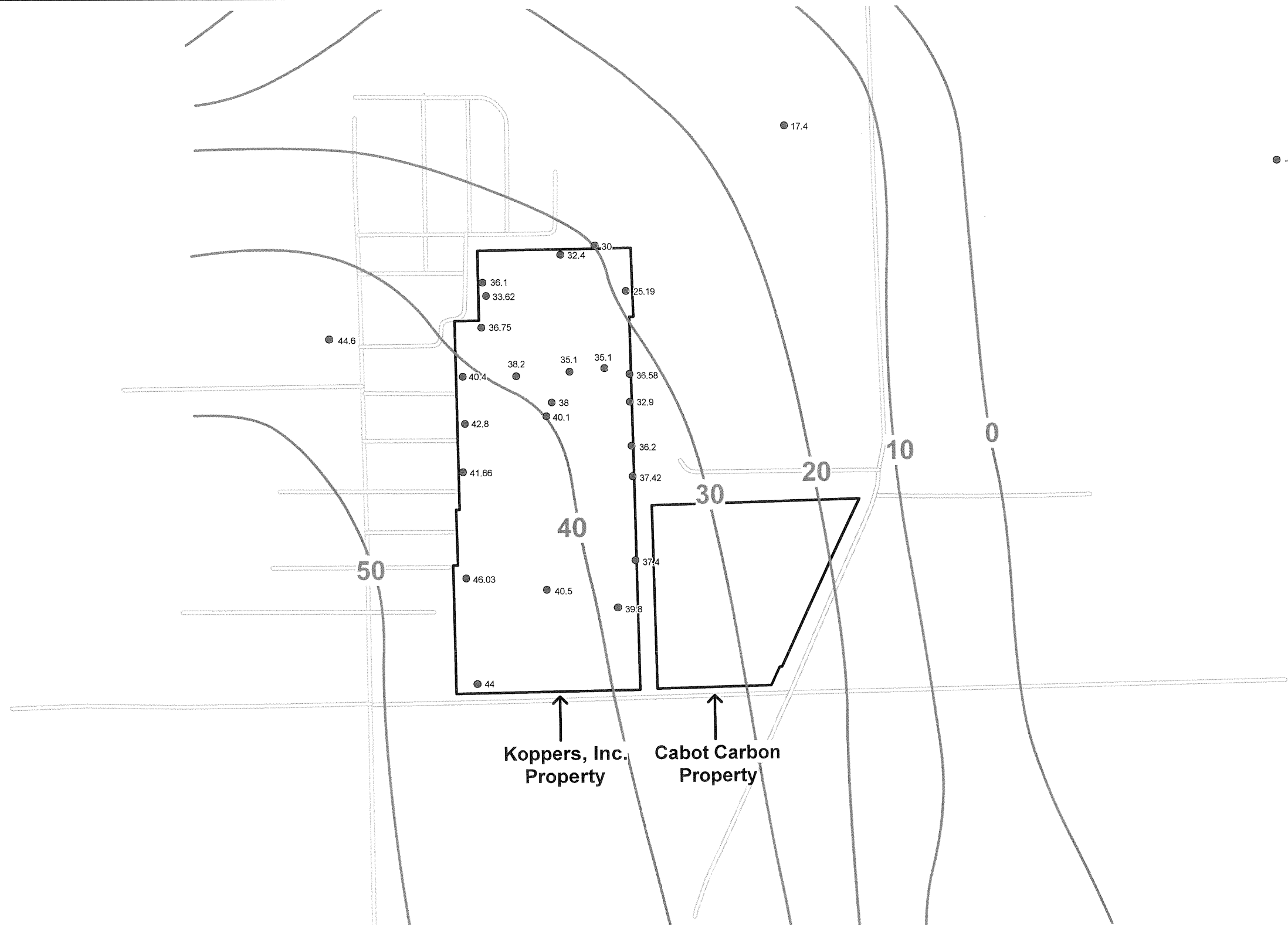
- 70.53 Geologic boring location with clay unit elevation in feet above msl.
- 80 Clay surface contour with elevation in feet above msl.



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| TITLE: Elevation contours for Hawthorn Group - top of lower clay unit | | |
| LOCATION: Gainesville, Florida | | |
| CHECKED | JRE | FIGURE: 5 |
| DRAFTED | DJB | |
| FILE | u m & l clay contours.wor | |
| DATE | 10/31/06 | |



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Explanation

- 46.03 Geologic boring location with clay unit elevation in feet above msl.
- 40 Clay surface contour, with elevation in feet above msl.

0 750 1,500
SCALE IN FEET

TITLE: Elevation contours for Hawthorn Group - bottom of lower clay unit

LOCATION: Gainesville, Florida

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|---------|---------------------------|---------------------|
| CHECKED | JRE | FIGURE: 6 |
| DRAFTED | DJB | |
| FILE | u m & l clay contours.wor | |
| DATE | 10/31/06 | |