

Beazer

BEAZER EAST, INC. C/O THREE RIVERS MANAGEMENT, INC.
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June 13, 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

RE: Transmittal of May 2006 Preliminary Laboratory Water-Quality Results: Upper Floridan Wells FW-22B and FW-23B, **Cabot Carbon/Koppers Superfund Site in Gainesville, Florida**

Dear Ms. McLaughlin:

Enclosed please find the May 2006 water-quality results for the Upper Floridan (UF) Aquifer wells FW-22B and FW-23B recently installed at the Koppers Inc. portion of the Cabot Carbon/Koppers Superfund Site in Gainesville, Florida (the "Site"). These two property boundary wells were installed downgradient of UF Aquifer well FW-12B to evaluate the potential downgradient extent of constituents detected in samples collected from this well in January and March 2006.

The results of the groundwater sampling for these new UF Aquifer wells are consistent with the conceptual model for the Site. No significant impacts to the UF Aquifer were identified in the eight sample zones for these two wells (four Westbay sample intervals in each of the two wells). All sample results were below the Federal MCLs and State GTCL water standards. The essentially nondetect concentrations of organic constituents in these two downgradient wells further demonstrate that the UF Aquifer is not extensively affected, and that there is no off-site migration of Site constituents in the UF Aquifer at levels that exceed Federal and State groundwater standards. The Columbia Analytical Services analytical reports for FW-22B and FW-23B are included in Attachment A.

The 56 samples (January and March 2006) collected from transect and source zone wells, in addition to the eight samples collected in May 2006 from the two property boundary UF Aquifer wells, demonstrate that significant impacts are not present in the UF Aquifer beneath the Site. These 64 samples collected from the 14 wells are consistent with over two years of monitoring data from the 11 UF wells previously installed at and in the immediate vicinity of the Site. All UF Aquifer wells at the Site support GeoTrans' numerical model results indicating that the Murphree Wellfield is not currently impacted and will not be impacted from Site constituents in the future.

Writer's Direct Dial: 412/208-8867

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Figure 1 shows the locations of UF Aquifer wells. Table 1 presents a summary of organic constituents detected in wells FW-22B and FW-23B. The sampling intervals for each of the wells are numbered from top to bottom with the uppermost interval labeled number 1 and the deepest interval labeled number 4.

Included in summary Table 1 are the dissolved arsenic concentrations for wells FW-22B and FW-23B. The low arsenic concentrations in these wells support previous sampling results from the 12 UF Aquifer wells installed as part of this program. These results are consistent with the well supported hypothesis that elevated arsenic concentrations are temporarily created due to the introduction of oxygenated drilling fluids, which solubilize naturally occurring arsenic. The low to nondetect concentrations in wells FW-22B and FW-23B are likely due to the significant development performed for the new UF Aquifer wells.

This completes the well installation and initial sampling requirements detailed in the EPA's July 12, 2005 letter to Beazer and GeoTrans's October 31, 2005 letter to EPA proposing the installation of two additional wells. Beazer is in the process of preparing a comprehensive report that will provide the details of the Floridan Aquifer well installation activities and sample results. We currently anticipate completion of this report in late June to early July 2006.

If you should have any questions concerning these data, please contact me at 412-208-8867, or Mr. Jim Erickson with GeoTrans, Inc. at 303-665-4390.

Sincerely,



Michael Sleska, P.E.
Environmental Manager

Attachment

cc: Randall Chaffins, USEPA
Bill O'Steen, USEPA
Kelsey Helton, FDEP
John Mousa, ACEPD
Brett Goodman, GRU
Jill Blundon
Mitch Brouman
Linda Paul, KI
Jim Erickson, GeoTrans

FIGURE 1. Locations of existing and new UF wells.

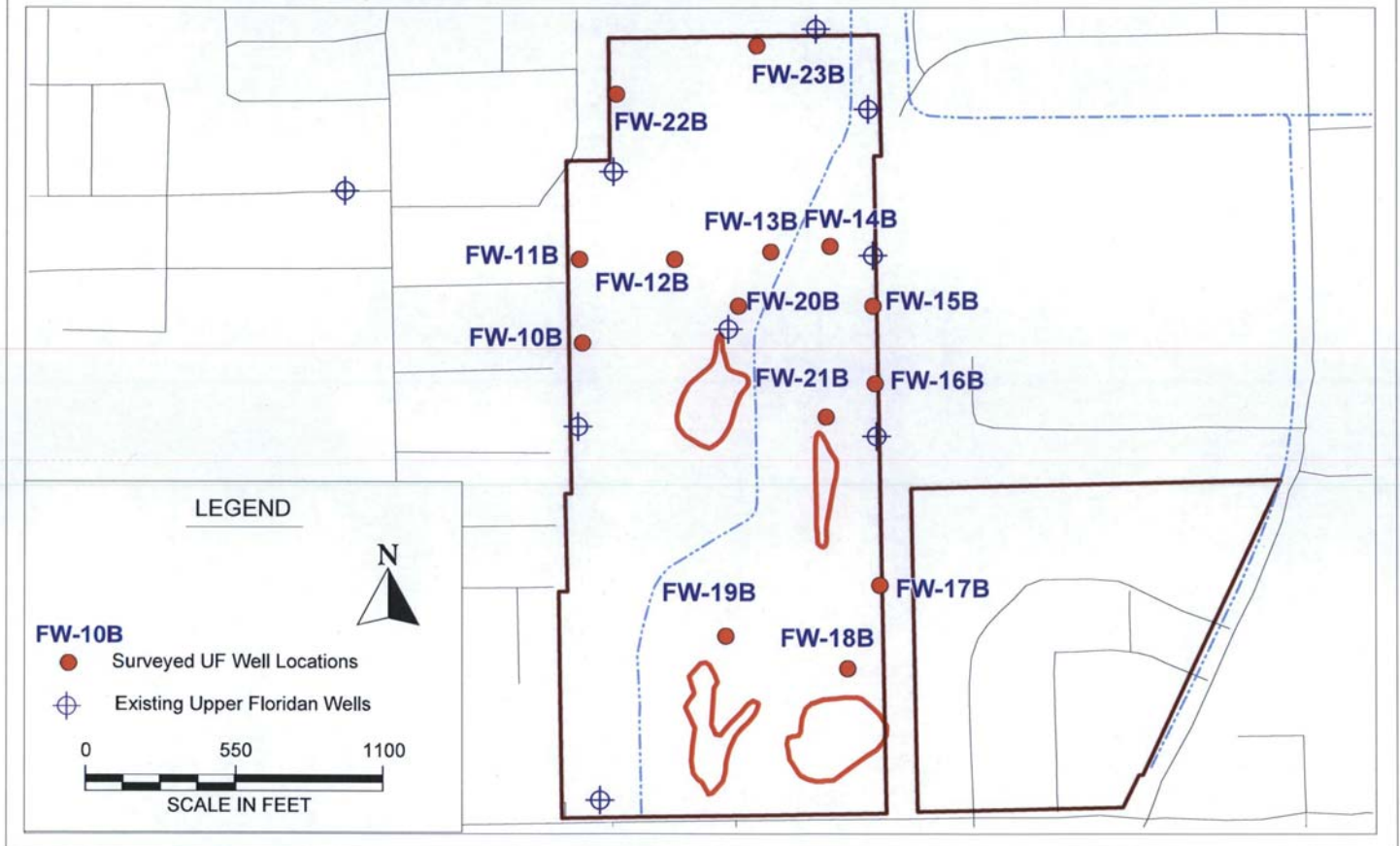


Table 1. Summary of organic constituents detected in wells at the Gainesville, Florida Cabot Carbon/Koppers Site May 2006.

| Constituent | Federal MCL (µg/L) | Florida GCTL (µg/L) | Well ID | | | | | | | |
|--------------------|--------------------|---------------------|---------|--------|--------|--------|--------|--------|--------|----------|
| | | | FW-22B | | | | FW-23B | | | |
| | | | Zone 4 | Zone 3 | Zone 2 | Zone 1 | Zone 4 | Zone 3 | Zone 2 | Zone 1 |
| Arsenic | 10 | 10 | 5.3 | 6.1 | 3.4 | 1.4 | | | | |
| Acenaphthene | - | 20 | 7.8 | 11 | 16 | 11 | | 0.44 I | 0.47 I | 0.505 *I |
| 2,4-Dimethylphenol | - | 140 | | | | | | 1.2 I | | 6.05 * |
| Flourene | - | 280 | 0.76 I | 1.1 I | 1.8 I | 0.85 I | | | | |
| 2-Methylphenol | - | 35 | | | | | | | | 5.05 *I |
| 4-Methylphenol † | - | - | | | | | | | | 2.2 *I |
| Naphthalene | - | 14 | | | | | | | | 1.3 *I |

Notes:

- * Average concentration of sample and duplicate
- † Analyte cannot be separated from 3-Methylphenol
- No published standard.
- I Reported value between the laboratory method detection limit and the laboratory practical quantitation limit.
- Blank value indicates the analyte was not detected above the laboratory detection limit.
- Result is above the Florida GCTL.
- Result is above the Florida GCTL, but below the Federal MCL.