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March 17, 2008

Via e-mail

Mr. Scott Miller
U.S. Environmental Protection Agency, Region IV
4WD-SRTMB
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

Subject: February 2008 Monthly Progress Report

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), attached is the February 2008 Monthly Progress Report for the Cabot Carbon/Koppers Superfund Site in Gainesville, Florida as required by 1991 Unilateral Administrative Order (UAO) and the 1994 UAO Amendment. If you have any questions or comments, please contact me at (303) 665-4390.

Sincerely,

A handwritten signature in black ink that reads "Gaius Roemer".

Gaius Roemer, P.E.
Senior Engineer

Enclosure

cc: J. Mousa (ACEPD)
K. Helton (FDEP)
M. Slenska (BEI)
M. Brouman (BEI)
P. Salisbury (KI)
J. Fankulewski (KI)

February 2008
MONTHLY PROGRESS REPORT
Cabot Carbon/Koppers Superfund Site
GAINESVILLE, FLORIDA

1. DESCRIPTION OF ACTIONS TAKEN TO COMPLY WITH THE UNILATERAL ADMINISTRATIVE ORDER (MARCH 1991) AND ESTIMATE OF THE PERCENTAGE OF THE RD/RA COMPLETED:

- Beazer's Operation and Maintenance (O&M) Contractor performed routine treatment plant operation and maintenance services for the ground water remedial system.
- Second Five-Year Review Report recommendations are being performed through 2008.

2. SUMMARY OF RESULTS OF SAMPLING AND TESTS AND ALL OTHER DATA DURING THE MONTH:

- Instantaneous flow rates and totalizer volumes were measured in each extraction well.
- 6.65 gallons of NAPL were bailed from the Hawthorn Group wells during the past month (2 recovery events), and a total of 245.71 gallons have been bailed since the start of the NAPL recovery program in June 19, 2004. The two-week recovery schedule was started October 25, 2005.
- A total of 1,008,000 gallons of ground water were recovered by the existing extraction system, treated and discharged to the Gainesville Regional Utilities (GRU) during this past month (operating period of 696 hours). The average recovery rate for the month was approximately 24.1 gallons per minute (gpm).

3. SUMMARY OF ALL PLANS, REPORTS, DELIVERABLES AND PROCEDURES COMPLETED:

- Completed monthly maintenance check.
- Inspected piezometers, extraction wells, piping, valves, treatment plant vessels and controls, buildings and grounds.
- Repaired/replaced EW-2 pump and sump pump.
- Shipped 102 drums of various waster products on February 25th and 28th.
- Cleaned static mixer and vacuumed stormwater from EW-5 well house.
- All offsite Hawthorn monitoring wells have been completed, developed, and sampled except HG-22D.
- Conducted 1st quarter sampling of Upper Floridan Aquifer monitoring wells the week of February 10th.
- Hawthorn recovery pilot test installation activities conducted February 25th through 27th. Operation began February 28th.
- Conducted sampling of Hawthorn recovery pilot test wells on February 7th and 8th.

4. PROJECTED WORK FOR THE NEXT MONTH (MARCH 2008) WITH SCHEDULE CONSIDERATIONS:

(Please see the attached draft schedule. Note that this is a working schedule and is likely to change.)

- Measure instantaneous flow rates and totalizer volumes for each extraction well.
- Continue NAPL removal from Hawthorn Group wells on a two-week schedule.
- Oversee sewer line repair and continue well installation activities at HG-22D.
- Continue Hawthorn NAPL recovery pilot test.

- Conduct Round 1 Sampling for the ISBS Pilot Test.

5. SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS AND ACTUAL OR ANTICIPATED DELAYS ENCOUNTERED DURING THE MONTH:

- A public-utility sewer line was accidentally damaged during drilling of Hawthorn Group well HG-22D just west of the site property line. The incident has caused minor delays in the drilling program.

6. ACTIONS BEING TAKEN TO RECTIFY PROBLEMS OR DELAYS:

- Gainesville Regional Utilities (GRU) and GeoTrans have communicated frequently regarding the incident at HG-22D.

7. SUPPLEMENTAL INFORMATION:

- Please see the attached draft schedule. Note that this is a working schedule and is likely to change.

8. CHANGES IN PERSONNEL DURING THIS MONTH:

- None this reporting period.

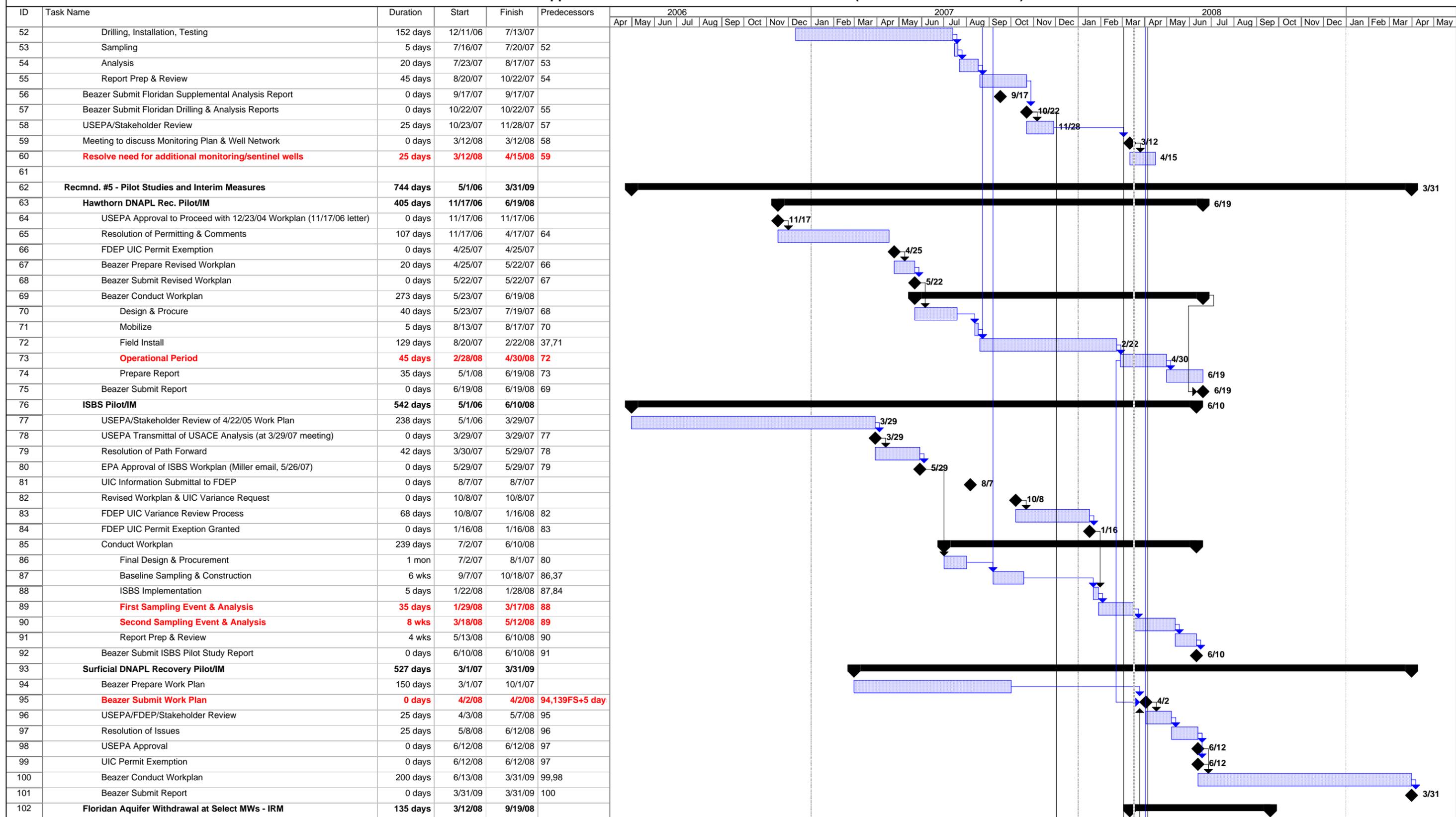
Cabot Carbon/Koppers Site: Combined Beazer USEPA Schedule (DRAFT FOR DISCUSSION)

ID	Task Name	Duration	Start	Finish	Predecessors	2006												2007												2008											
						Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
1	Complete 2006 5-Year Review Tasks	744 days	5/1/06	3/31/09		[Summary bar from 5/1/06 to 3/31/09]																																			
2	Recmnd. #1 - Evaluate Surficial Aquifer Extraction System	594 days	8/1/06	11/25/08		[Summary bar from 8/1/06 to 11/25/08]																																			
3	Beazer Evaluation	104 days	8/1/06	12/22/06		[Task bar from 8/1/06 to 12/22/06]																																			
4	Beazer Evaluation Submittal (12/22/06 letter)	0 days	12/22/06	12/22/06	3	[Milestone diamond at 12/22/06]																																			
5	GRU Comments Transmittal (3/27/07 letter)	0 days	3/27/07	3/27/07		[Milestone diamond at 3/27/07]																																			
6	USEPA Comments Transmittal (4/2/07 email)	0 days	4/2/07	4/2/07		[Milestone diamond at 4/2/07]																																			
7	Phone Conference: O'Steen/Erickson, After Surficial Resample	0 days	6/1/07	6/1/07		[Milestone diamond at 6/1/07]																																			
8	Discuss Surficial Results - Implications on Extraction System	0 days	3/12/08	3/12/08	139FS+5 days	[Milestone diamond at 3/12/08]																																			
9	Beazer Prepare Plan for Extraction System & Monitoring	27 days	3/12/08	4/17/08	8	[Task bar from 3/12/08 to 4/17/08]																																			
10	Beazer Submit Plan	0 days	4/17/08	4/17/08	9	[Milestone diamond at 4/17/08]																																			
11	Comment, Resolution and Approval	35 days	4/18/08	6/6/08	10	[Task bar from 4/18/08 to 6/6/08]																																			
12	USEPA Approval of Work Plan	0 days	6/6/08	6/6/08	11	[Milestone diamond at 6/6/08]																																			
13	Beazer Implement Work Plan for System Modifications	120 days	6/9/08	11/25/08	12	[Task bar from 6/9/08 to 11/25/08]																																			
14	New System Operational	0 days	11/25/08	11/25/08	13	[Milestone diamond at 11/25/08]																																			
15																																									
16	Recmnd. #2 - Sediment and Surface Water Sampling	234 days	5/5/06	3/30/07		[Summary bar from 5/5/06 to 3/30/07]																																			
17	ACEPD Off-Site Sediment Data 1994-2000 Transmittal	0 days	5/5/06	5/5/06		[Milestone diamond at 5/5/06]																																			
18	ACEPD Off-Site Water/Sediment Data Sep 2006 Transmittal	0 days	12/13/06	12/13/06		[Milestone diamond at 12/13/06]																																			
19	Beazer Soil & Sediment Data Summary Report Submittal (3/30/07)	0 days	3/30/07	3/30/07		[Milestone diamond at 3/30/07]																																			
20	RECOMMENDATION RESPONSE COMPLETED	0 days	3/30/07	3/30/07	19	[Milestone diamond at 3/30/07]																																			
21																																									
22	Recmnd. #3 - Hawthorn Investigation	342 days	11/17/06	3/21/08		[Summary bar from 11/17/06 to 3/21/08]																																			
23	Beazer Updated Site Stratigraphy Submittal (11/17/06 letter)	0 days	11/17/06	11/17/06		[Milestone diamond at 11/17/06]																																			
24	EPA Additional Monitoring Request (3/1/07 letter)	0 days	3/1/07	3/1/07		[Milestone diamond at 3/1/07]																																			
25	Beazer Prepare Hawthorn Investigation Plan	23 days	3/1/07	4/2/07	24	[Task bar from 3/1/07 to 4/2/07]																																			
26	Beazer Hawthorn Investigation Plan Submittal (3/31/07 Workplan)	0 days	4/2/07	4/2/07	25	[Milestone diamond at 4/2/07]																																			
27	USEPA/Stakeholder Review	31 days	4/3/07	5/15/07	26	[Task bar from 4/3/07 to 5/15/07]																																			
28	ACEPD Comments on Hawthorn Investigation WP (5/9/07 letter)	0 days	5/9/07	5/9/07		[Milestone diamond at 5/9/07]																																			
29	USEPA Comments on Hawthorn Investigation (5/15/07 email)	0 days	5/15/07	5/15/07	27	[Milestone diamond at 5/15/07]																																			
30	Resolution of Issues	19 days	5/16/07	6/12/07	29	[Task bar from 5/16/07 to 6/12/07]																																			
31	Beazer Submit Revised Workplan (6/12/07)	0 days	6/12/07	6/12/07	30	[Milestone diamond at 6/12/07]																																			
32	USEPA Comment Letter (6/29/07)	0 days	6/29/07	6/29/07	31	[Milestone diamond at 6/29/07]																																			
33	Beazer Submit Revised #2 Workplan (7/20/07)	0 days	7/20/07	7/20/07	32	[Milestone diamond at 7/20/07]																																			
34	USEPA Approval of Work Plan	0 days	8/7/07	8/7/07	33FS+6 days	[Milestone diamond at 8/7/07]																																			
35	Beazer Carry Out Work Plan	178 days	7/10/07	3/21/08		[Task bar from 7/10/07 to 3/21/08]																																			
36	Subcontracting	4 wks	7/10/07	8/7/07	34FF	[Task bar from 7/10/07 to 8/7/07]																																			
37	Mobilization	1 wk	8/13/07	8/17/07	36	[Task bar from 8/13/07 to 8/17/07]																																			
38	Well Installation & development	59 days	8/20/07	11/9/07	37	[Task bar from 8/20/07 to 11/9/07]																																			
39	Report Preparation & Review	18 wks	11/12/07	3/21/08	38	[Task bar from 11/12/07 to 3/21/08]																																			
40	Beazer Submit Hawthorn Investigation Report	0 days	3/21/08	3/21/08	39	[Milestone diamond at 3/21/08]																																			
41																																									
42	Recmnd. #4 - Floridan Monitoring	453 days	7/10/06	4/15/08		[Summary bar from 7/10/06 to 4/15/08]																																			
43	Beazer Prepare Floridan Drilling Report	13 days	7/10/06	7/26/06		[Task bar from 7/10/06 to 7/26/06]																																			
44	Beazer Submit Floridan Drilling Report (7/26/06)	0 days	7/26/06	7/26/06	43	[Milestone diamond at 7/26/06]																																			
45	Beazer Prepare Additional Drilling/Testing Workplan	25 days	7/17/06	8/18/06		[Task bar from 7/17/06 to 8/18/06]																																			
46	Beazer Submit Floridan Drilling Workplan (8/18/07)	0 days	8/18/06	8/18/06	45	[Milestone diamond at 8/18/06]																																			
47	USEPA Review of Drilling Work Plan	48 days	8/21/06	10/25/06	46	[Task bar from 8/21/06 to 10/25/06]																																			
48	USEPA Alternative Floridan Drilling/Testing Plan (10/25/06 letter)	0 days	10/25/06	10/25/06	47	[Milestone diamond at 10/25/06]																																			
49	Beazer Response to EPA Alternative Plan (12/18/06 letter)	0 days	12/18/06	12/18/06		[Milestone diamond at 12/18/06]																																			
50	Beazer Agrees to Perform Hydraulic Testing (3/1/07 letter)	0 days	3/1/07	3/1/07		[Milestone diamond at 3/1/07]																																			
51	Beazer Conduct Modified Aug 18 2006 Workplan	222 days	12/11/06	10/22/07		[Summary bar from 12/11/06 to 10/22/07]																																			

Date: 3/17/08
 Current/In-Progress Item
 Completed Major Task

Task		Progress		Summary		External Tasks		Deadline	
Split		Milestone		Project Summary		External Milestone			

Cabot Carbon/Koppers Site: Combined Beazer USEPA Schedule (DRAFT FOR DISCUSSION)



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103	Beazer Prepare Floridan IRM Workplan	25 days	3/12/08	4/15/08																																					
104	EPA/FDEP/Stakeholder Review	25 days	4/16/08	5/20/08	103																																				
105	Resolution of Issues	25 days	5/21/08	6/25/08	104																																				
106	USEPA Approval	0 days	6/25/08	6/25/08	105																																				
107	Install System	60 days	6/26/08	9/19/08	106																																				
108	Begin Operation	0 days	9/19/08	9/19/08	107																																				
109																																									
110	Recmnd. #6 - Source Delineation & Potential for Downward Migration	402 days	11/17/06	6/16/08																																					
111	Beazer Updated Site Stratigraphy Submittal (11/17/06 letter)	0 days	11/17/06	11/17/06																																					
112	EPA 4/18/07 Tansmittal of Comments on Recommendation #6	0 days	4/18/07	4/18/07																																					
113	Beazer Response to Comments	8 wks	1/28/08	3/21/08	112,39FF																																				
114	Beazer Submit Response to Comments	0 days	4/4/08	4/4/08	113,40FS+10 da																																				
115	Resolution of Remaining Issues	50 days	4/7/08	6/16/08	114																																				
116																																									
117	Recmnd. #7 - Arsenic Evaluation	445 days	7/10/06	4/3/08																																					
118	Beazer Prepare Arsenic Evaluation	189 days	7/10/06	3/30/07																																					
119	Beazer Submit Arsenic Evaluation Report (3/30/07)	0 days	3/30/07	3/30/07	118																																				
120	RECOMMENDATION RESPONSE COMPLETED	0 days	3/30/07	3/30/07	119																																				
121	USEPA Agreement & Comment on Report (5/15/07 email)	0 days	5/15/07	5/15/07																																					
122	Beazer Response to Comments	45 wks	5/15/07	4/3/08	121																																				
123	Beazer Submit Response to Comments	0 days	4/3/08	4/3/08	122																																				
124																																									
125	Recmnd. #9 - Surficial Well Redevelopment & Sampling	359 days	7/10/06	12/3/07																																					
126	Beazer Prepare Workplan	81 days	7/10/06	10/30/06																																					
127	Beazer Submit Workplan (10/30/06)	0 days	10/30/06	10/30/06	126																																				
128	USEPA/Stakeholder Review	28 days	10/31/06	12/7/06	127																																				
129	USEPA Comment Letter (12/7/06)	0 days	12/7/06	12/7/06	128																																				
130	Beazer Update Workplan	85 days	12/8/06	4/6/07	129																																				
131	Beazer Submit Responses & Revised Workplan (4/6/07)	0 days	4/6/07	4/6/07	130																																				
132	USEPA/Stakeholder Review	36 days	4/9/07	5/29/07	131																																				
133	USEPA Approval of Surficial Redevelopment/Sampling Workplan	0 days	5/29/07	5/29/07	132																																				
134	Beazer Conduct Workplan	95 days	7/16/07	11/28/07																																					
135	Redevelopment	10 days	7/16/07	7/27/07	133																																				
136	Sampling	10 days	7/30/07	8/10/07	135																																				
137	Analysis	15 days	8/13/07	8/31/07	136																																				
138	Report Prep & Review	12 wks	9/4/07	11/28/07	137																																				
139	Beazer Submit Data Report (12/3/07)	0 days	12/3/07	12/3/07	138																																				
140	RECOMMENDATION RESPONSE COMPLETED	0 days	12/3/07	12/3/07	139																																				
141																																									
142	Recmnd. #11 - Reevaluate COCs	186 days	7/31/07	4/23/08																																					
143	Technical Risk Assessment Conference Call	0 days	7/31/07	7/31/07																																					
144	Resolve Path Forward for Risk & Cleanup Criteria	5 wks	12/3/07	1/9/08	57,139,159																																				
145	USEPA & Beazer Analyze Risk and Develop Criteria	15 wks	1/10/08	4/23/08	144																																				
146	Meeting to Discuss Approach	0 days	3/13/08	3/13/08																																					
147	USEPA Issue Cleanup Criteria	0 days	4/23/08	4/23/08	145																																				
148																																									
149	Recmnd. #12 - Surface Soil Delineation	328 days	7/10/06	10/17/07																																					
150	USEPA Review of 2/8/06 Workplan	39 days	7/10/06	8/31/06																																					
151	USEPA Comment Letter	0 days	8/31/06	8/31/06	150																																				
152	Beazer Update of Workplan	17 days	9/1/06	9/25/06	151																																				
153	Beazer Submit Comment Responses and Revised Workplan (9/25/06)	0 days	9/25/06	9/25/06	152																																				

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