

July 23, 2010

Mr. Ashwin B. Patel, Supervisor
Hazardous Waste Section
Florida Department of Environmental Protection
Northeast District
7825 Baymeadows Way, Suite 200B
Jacksonville, FL 32256-7590

VIA EMAIL

Subject: Follow-up to Non-Compliance Letter NCL10-2552HW10NED
Former Koppers Facility, Gainesville, Alachua County, Florida
USEPA/FDEP ID: FLD 004 057 535

Dear Mr. Patel:

On behalf of Beazer East, Inc. (Beazer), this letter provides a follow-up response to the referenced May 18, 2010, Non-Compliance Letter for the subject Site. An earlier response letter was sent on June 18, 2010. This letter documents an additional cleanup activity.

During our conversation last Wednesday (July 14, 2010), you indicated that there was one outstanding issue referenced as part of a “potential violation” in your May 18 letter that was not yet addressed. The potential violation was: “The facility also failed to cleanup and remove accumulated oil and debris from the secondary containment for the used oil tank in the fuel/oil storage area.” This was an oversight as we were awaiting the mobilization of our demolition contractor to complete this work, not knowing the time it would take to get a permit for that work from the City of Gainesville.

In order to address the issue, last week Beazer’s Site operation and maintenance contractor conducted cleanup activities of the secondary containment area around the used oil tank in the fuel/oil area. Specifically, on July 15, debris was removed and an absorbent clay material was applied to the secondary containment floor. The absorbent was removed and scraped out on July 16. Approximately 10 gallons of material were removed and containerized for proper off-Site disposal. A photo of the area is shown below.



Also, Beazer is still planning the Site-wide demolition and decontamination activities, and the drip-pad closure activities, presented in the June 2, 2010 *Short-Term Interim Measures Work Plan*. We are working with the City of Gainesville to get the necessary permit(s) so that we can perform the operations efficiently and effectively. We have just received comments on the demolition plan from various City departments and will be following up very soon.

Finally, please note that all hazardous waste collected at the Site is being stored at the Site hazardous-waste temporary storage structure adjacent to the groundwater treatment facility. The hazardous-waste containers are appropriately labeled (see examples below). The earliest accumulation start date for hazardous waste presently stored at the Site is May 13, 2010. All waste will be shipped for disposal within 90 days of the accumulation start date.



Please call Mitchell Brouman or me if you have any other questions or concerns.

Sincerely,

Gregory W. Council, P.E.
Principal Engineer

cc: Scott Miller, USEPA
Kelsey Helton, Florida DEP
John Mousa, Alachua County EPD
Linda Paul, Koppers, Inc.
Mitchell Brouman, Beazer
Bob Fisher, Beazer