



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
61 Forsyth Street SW
Atlanta, GA 30303

November 17, 2006

Mr. Mike Slenska
Environmental Manager
Beazer East, Inc.
One Oxford Centre, Suite 3000
Pittsburgh, PA 15219-6401

SUBJECT: Site Remedial Activity Schedule and Status of Five-Year Review
Recommendations, Koppers Superfund Site, Gainesville, Florida

Dear Mr. Slenska:

The United States Environmental Protection Agency (EPA) has reviewed the status of remedial activities requiring implementation at the Koppers Superfund Site. This letter provides a discussion of implementation issues and schedules for the remedial activities required at the Koppers Site.

EPA's Second Five-Year Review Report for Cabot Carbon / Koppers Superfund Site, Gainesville, Florida (April 4, 2006) identified recommendations for remedial activities that apply to the Koppers Site. EPA has discussed these with Beazer during several teleconferences and meetings, and Beazer commented on the Five-Year Review Report in its June 2, 2006, letter to EPA. Summarized below, for each remedial activity, are the requirements for Beazer's implementation of these activities.

Remedial Activities to be Implemented at the Koppers Site:

(1) The Koppers surficial extraction system should be re-evaluated to determine optimum well locations, optimum well spacing, and well pumping rates. An evaluation for adding wells near source areas and laterally, as necessary, should be performed to maintain hydraulic capture of the surficial groundwater. In its June 2, 2006, letter to EPA, Beazer stated it could complete the evaluation by December 1, 2006, which is the five-year review Milestone Date.

(2) In the ditch located immediately offsite and northeast of Koppers, sediment and water sampling should be conducted for analysis of Contaminants of Concern (COCs). The groundwater exiting the site must meet surface water criteria since the groundwater is discharging to a ditch that flows into Springstead Creek. The five year review Milestone Date for this action is July 31, 2006. Beazer is completing sampling of the on-site ditch in accordance with the September 25, 2006, "Revised Supplemental Sampling Plan –

Additional Data for Risk Assessment”, prepared by AMEC for Beazer. According to Beazer’s schedule, this should be completed by March 31, 2007. On September 14, 2006, the Alachua County Environmental Protection Department (ACEPD) collected sediment and surface water samples in the offsite ditch. Sediment samples were also collected in Springstead Creek. The data report is not available yet.

(3) The Hawthorn Group should be further characterized to delineate the extent of contamination.

The five-year review Milestone Date for this action is March 31, 2007. This is the date by which Beazer should develop a sampling/analysis plan for characterization of the Hawthorn, including ITF-3 (east) and west of the Koppers site (offsite), installation of additional monitoring wells, sampling, groundwater analysis, and conduct an evaluation of the site stratigraphy. Beazer had proposed to submit and implement a Hawthorn groundwater monitoring plan and reevaluate the site stratigraphy (at all depths down to 140 ft), utilizing new core information obtained over the last year. However, in its June 2, 2006, letter to EPA, Beazer stated that it “does not believe that detailed Hawthorn Group delineation is necessary for remedial decision making, and that drilling for Hawthorn Group delineation is risky because it will create potential conduits through the low permeability deposits of the Hawthorn Group”. Beazer did state that “additional Hawthorn Group work could potentially focus on addressing the question of off-site migration/risk versus source delineation”. It is unclear what this approach would entail. Furthermore, EPA is convinced that Hawthorn wells can be designed with minimal risk to the subsurface. EPA requests that Beazer submit a plan to EPA by December 29, 2006, for installation of additional Hawthorn wells to the west and east of the existing Hawthorn wells. Once the Hawthorn well plan is approved, EPA requests that Beazer install and monitor additional Hawthorn wells, as well as conduct an evaluation of the site stratigraphy by March 31, 2007.

(4) The Floridan wells installed by Beazer should continue to be monitored regularly. Vertical and horizontal delineation of groundwater contaminants should be established.

The five-year review Milestone Date for this action is March 31, 2007. Beazer has been monitoring the Floridan wells quarterly and has submitted a Floridan Aquifer Monitoring Report to EPA, which included Beazer’s proposed a plan for installation and monitoring of additional Floridan wells. EPA provided review comments on Beazer’s recent Floridan aquifer reports in a letter dated October 25, 2006, and included EPA’s plan that Beazer is required to implement for additional investigation in the Floridan aquifer. EPA requests that Beazer submit a detailed work plan by December 15, 2006, for installation and monitoring of additional Floridan wells in accordance with EPA’s October 25, 2006, letter.

(5) Interim remedial measures at the source areas should be evaluated and implemented, if feasible, to prevent further contamination. The five-year review date for this action is December 1, 2006, to evaluate and implement, if feasible, interim remedial measures at the source areas. EPA has previously requested, and formally requests in this letter, that

Beazer implement the Pilot Study Work Plan for the Upper Hawthorn Group DNAPL Recovery, Key Environmental and GeoTrans (December 23, 2004), incorporating all Stakeholder comments and responses in Key Environmental's response to comments letter dated May 2, 2005).

Separately from this letter, EPA will address issues associated with implementing the Remediation Grouting work plan submitted to EPA in December 2004, and the *In Situ* Biogeochemical Stabilization work plan submitted to EPA on September 7, 2006. At this time, EPA does not request implementation of these work plans.

(6) The vertical and lateral extent of arsenic contamination in the groundwater on and off site should be delineated. Identification of background and baseline arsenic concentrations is also needed as part of the investigation. The five-year review date for this action is December 1, 2006. Beazer's June 2, 2006, letter to EPA stated that a date of March 31, 2007, should be achievable. Beazer has evaluated arsenic impacts in the Floridan Aquifer in a June 2005 letter to Gainesville Regional Utilities, which included preliminary comments on "Arsenic Concentrations in Groundwater in the Vicinity of Koppers and Murphree Wellfield" (Dr. Thomas Pichler, May 2005).

(7) All of the surficial wells installed in the 1984 to 1995 investigations should be cleaned out and redeveloped. Re-surveying of the wells should be performed as necessary. Regular monitoring of all the wells and sample analysis for all site COCs should be performed. The five-year review Milestone Date for this action was July 31, 2006. On October 30, 2006, EPA submitted a letter proposing wells for redevelopment and sampling and attached information regarding well redevelopment and sampling status for surficial wells at the Koppers site. EPA has reviewed this submittal and is coordinating with other regulatory stakeholders to provide feedback to Beazer prior to implementation.

(8) The list of COCs and associated remedial goals (including dioxins, arsenic, and phenolic compounds) should be re-evaluated based on more recent toxicological information. The five-year review date for this action is December 1, 2006. Remedial goals for surface and subsurface soils, based on direct exposure and wind-blown pathways, are being re-developed. EPA requests that Beazer develop remedial goals based on soil leachability and protection of groundwater. Additionally, groundwater and surface water remedial goals need to be re-evaluated. EPA requests that Beazer contact EPA by December 15, 2006, to work out an approach to developing these remedial goals with EPA.

(9) The extent of soil contamination for all COCs (including arsenic and dioxin) needs to be delineated on and off site and addressed, if necessary, to assure protectiveness. The five-year review date for this action is March 31, 2007. Beazer has submitted the "Revised Supplemental Sampling Plan - Additional Data for Risk Assessment" (AMEC,

September 25, 2006), which incorporated comments made by regulatory stakeholders. EPA understands that Beazer intends to implement the plan, starting November 28, 2006.

(10) Beazer has conducted an evaluation of thermal and surfactant remediation technologies for the Cabot/Koppers site and is preparing a written document. EPA requests that the detailed, written evaluation be submitted to EPA by December 4, 2006.

Thank you for your efforts on the Cabot/Koppers project. Please contact me at (404) 562-8776 to discuss the issues in this letter further.

Sincerely,



Amy L. McLaughlin
Remedial Project Manager

cc: Kelsey Helton, FDEP
John Mousa, ACEPD
Brett Goodman, GRU