GAINESVILLE REGIONAL UTILITIES

Water & Wastewater Engineering

September 7, 2005

Dr. James Mercer
Geotrans, Inc.
46010 Manekin Plaza, Suite 100
Sterling, Virgina 20166

Jim Erickson
Geotrans, Inc.
363 Centennial Parkway, Suite 210
Louisville, CO 80027

RE: Letter Dated July 14, 2005

Dear Dr. Mercer and Mr. Erickson:

We stand by the facts presented by Dr. Cleary and our consultant team in the June 26, 2005 Gainesville Sun Editorial. The information was not misleading and is supported by the data and observations gathered as part of the site investigations at the Superfund site. We applaud any efforts that Geotrans, Inc. puts forward to cleanup the Koppers site and protect the City of Gainesville's water supply; however, to date our confidence in Geotrans' commitment to protecting our water supply has been eroded due to several factors:

- Endorsing a groundwater model that does not represent, in a suitably conservative manner, contaminant migration in the Floridan aquifer or the Hawthorn group;
- Continuing to disregard contamination found in the Floridan aquifer at levels 100 times the cleanup standard with supporting evidence of contamination at other Floridan wells at the site;
- Asserting that creosote contamination is not mobile in lower aquifer units when limited investigations shows that creosote NAPL [nonaqueous phase liquid] has been observed at depths 120 below surface and that there is creosote contamination in the Floridan aquifer;
- Dismissing the fact that the surficial aquifer contains arsenic at 500 times the drinking water standard and supporting the argument that there is no potential for this arsenic to migrate down to the Floridan even with evidence of natural pathways for creosote, large downward hydraulic gradients and arsenic contamination in the Floridan aquifer; and
- Promoting long open boreholes in the Florida Aquifer that are of limited value in characterizing the magnitude and nature of contamination in the Floridan Aquifer and that allow mixing between zones in the Floridan that could render future multilevel monitoring ineffective.

We would request Geotrans and its staff consider the prospects of contamination in their respective drinking water supplies as it evaluates the Gainesville site. In other words, would Geotrans accept in its own community drinking water naphthalene at 13 ug/L, one part per billion under the cleanup standard or accept taste and odor problems even though the drinking water might satisfy numeric

standards? Our approach is to make sure that the contamination at the Koppers Site is effectively cleaned up prior to any contamination impacting the Murphree Wellfield, rather than waiting for our water supply to become contaminated before acting. We believe that the recent plan for monitoring water quality in the Upper Floridan aquifer, developed by EPA with input from other stakeholders, will eliminate much of the uncertainty regarding the distribution and movement of contaminants at the Koppers Site.

We will continue to use the best science available to serve our customers and to protect our community's water supply.

Sincerely,

Brett Goodman, P.E.
Supervising Utility Engineer

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John Mousa (ACEPD)
Kelsey Helton (FDEP)
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