

March 20, 2006

Ms. Amy McLaughlin  
Remedial Project Manager  
US Environmental Protection Agency – Region 4  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

RE: Floridan Monitoring Plan  
Cabot Carbon/Koppers Superfund Site, Gainesville Florida

Dear Ms. McLaughlin:

The following are requests associated with ongoing work being performed by Beazer East, Inc. (Beazer) on the Cabot Carbon / Koppers Superfund Site in Gainesville, FL. As you are aware, Beazer is in the process of installing two additional Floridan monitoring wells, FW-22B and FW-23B and have proposed installing a deeper Floridan monitoring well, FW-24C. We request the following to be completed prior to the completion of these monitoring wells:

1. All head measurements taken during the development and sampling for all monitoring zones must be submitted by Beazer for review by all stakeholders. This information should be submitted prior to the installation of the Westbay monitoring system in wells FW-22B and FW-23B. This information will provide a better understanding of each well's ability to monitor discreet intervals in the Floridan and assist with interpretation of existing and future analytical results.
2. Wells FW-22B and FW-23B must be logged with a high precision flow meter prior to the installation of the Westbay monitoring well. This will measure the amount of vertical gradients that may exist within the Upper Floridan between monitoring zones. It will also aid in our understanding of the effectiveness of the fine sand annual seal that Beazer is using to isolate monitoring intervals when compared to the head measurements requested above. This will be the only opportunity to gather this type of information with the alternative well design. Beazer has assumed that vertical gradients are minimal within the UTZ; however, there is no field data to substantiate this assumption. This issue will be critical to interpreting all future data from installed monitoring wells.
3. Well FW-24C was proposed by Beazer as a result of contamination being found in the lowest two monitoring intervals in the Upper Transmissize Zone (UTZ) of the Floridan Aquifer. Since the current Floridan monitoring plan does not include design details for this type of installation, this well must not be installed until all stakeholders agree with the proposed construction. At this time, GRU does not agree with the well construction being proposed by Beazer. GRU has not accepted that the rotosonic drilling method is not causing disaggregation of the Floridan Aquifer. Drilling into the lower layers of the Floridan Aquifer may produce the same anomalous behavior as encountered in all depths of the UTZ with the rotosonic drilling. This

**Ms. McLaughlin**

**March 20, 2006**

**Page 2**

issue must be addressed prior to construction. At this time, GRU will not accept fine sand seals between monitoring zones in Well FW-24C.

These requests are consistent with the concerns raised by GRU back in October 2005, when the alternative well design was proposed by Beazer due to the anomalous findings in the Upper Floridan. At that time, GRU's Team expressed a number of concerns with the proposed construction that included:

- The rotosonic drilling method is causing the Upper Floridan formation to disaggregate leading to erroneous characterization of the Upper Floridan.
- Additional tests comparing drilling methods should be conducted before additional wells are installed that may be compromised by the limitations listed below.
- The fine sand may not isolate the monitoring zones and may allow vertical flow between monitoring zones which will influence the monitoring results.
- Four monitoring zones limit the wells' ability to monitor discreet intervals in the Floridan which will likely result in diluted concentrations and less information about the potential contamination in the Floridan.

We appreciate your immediate action on these items since FW-22B and FW-23B are currently being constructed. If you need additional information, please contact me at 352-393-1613.

Sincerely,



Brett Goodman, P.E.

Supervising Utility Engineer

xc: Mike Slenska (Beazer)  
Jim Erickson (Geotrans)  
John Mousa (ACEPD)  
Kelsey Helton (FDEP)  
Paul Myers (ACDH)  
David Richardson, Kim Zoltek, Rick Hutton (GRU)  
GRU Team