

June 7, 2005

Ms. Amy Williams
Remedial Project Manager
United States Environmental Protection Agency
Region IV, Superfund North Florida Section
61 Forsyth Street, SW
Atlanta, GA 30303

RE: GRU DNAPL Consultant Team Review of GeoTrans Groundwater Flow and Transport Model for Koppers Superfund Site, Gainesville, Florida

Dear Ms. Williams:

The attached report presents the results of the GRU DNAPL Consultant Team review of the GeoTrans Groundwater Flow and Transport Model for the Koppers Superfund site in Gainesville, Florida. As indicated in the attached report, there are several concerns with regard to assumptions used in the model. Based on running the model with assumptions which are more appropriate for the site the report indicates that predicted travel times for contaminants from the Koppers site to reach the City of Gainesville's Murphree Wellfield may be as low as 4 to 5 years, and that Floridan Aquifer contamination below the Koppers site poses a significant threat to the City's water supply.

Based on the results from this report, the GRU is demanding that EPA direct Beazer East to:

- 1) Implement comprehensive Floridan monitoring within 60 days
- 2) Design interim Floridan recovery and treatment within 120 days to contain contamination on the site
- 3) Install Floridan recovery and treatment within 180 days
- 4) Begin source (contaminant) removal in the surficial (surface) aquifer as part of an initial remedial action. Urgency depends on Floridan monitoring findings.

As we have indicated earlier, the Floridan Aquifer monitoring plan as currently proposed by Beazer East is not adequate to assess the extent of Floridan Aquifer contamination below the site. A transect of multi-level wells, including wells located immediately downstream of source areas, as proposed by GRU in our April 1, 2005 letter, is required to adequately assess the Floridan Aquifer contamination and the immediate threat to the Murphree wellfield.

Ms. Amy Williams

August 31, 2004

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We appreciate EPA 's commitment to this site. If you need additional information, please contact me at 352-393-1218 or Brett Goodman and 352-393-1613.

Sincerely,

A handwritten signature in black ink that reads "Rick Hutton". The signature is written in a cursive style with a long, sweeping underline.

Rick Hutton, P.E.

Senior Water/Wastewater Utility Engineer

xc: Mike Slenska (Beazer)
John Mousa (ACEPD)
Kelsey Helton (FDEP)
Paul Myers (ACDOH)
John Herbert (Jones Edmunds)
David Richardson, Brett Goodman, Kim Zoltek (GRU)
Correspondence