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January 18, 2008

Via U.S. Mail

Mr. Scott Miller
U.S. Environmental Protection Agency, Region IV
4WD-SRTMB
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-3104

Subject: December 2007 Monthly Progress Report

Dear Mr. Miller:

On behalf of Beazer East, Inc. (Beazer), attached is the December 2007 Monthly Progress Report for the Cabot Carbon/Koppers Superfund Site in Gainesville, Florida as required by 1991 Unilateral Administrative Order (UAO) and the 1994 UAO Amendment. If you have any questions or comments, please contact me at (303) 665-4390.

Sincerely,

A handwritten signature in black ink that reads "Gaius Roemer".

Gaius Roemer, P.E.
Senior Engineer

Enclosure

cc: J. Mousa (ACEPD)
K. Helton (FDEP)
M. Slenska (BEI)
M. Brouman (BEI)
P. Salisbury (KI)
J. Fankulewski (KI)

December 2007
MONTHLY PROGRESS REPORT
Cabot Carbon/Koppers Superfund Site
GAINESVILLE, FLORIDA

1. DESCRIPTION OF ACTIONS TAKEN TO COMPLY WITH THE UNILATERAL ADMINISTRATIVE ORDER (MARCH 1991) AND ESTIMATE OF THE PERCENTAGE OF THE RD/RA COMPLETED:

- Beazer's Operation and Maintenance (O&M) Contractor performed routine treatment plant operation and maintenance services for the ground water remedial system.
- Second Five-Year Review Report recommendations are being performed through 2007.

2. SUMMARY OF RESULTS OF SAMPLING AND TESTS AND ALL OTHER DATA DURING THE MONTH:

- Instantaneous flow rates and totalizer volumes were measured in each extraction well.
- 6.8 gallons of NAPL were bailed from the Hawthorn Group wells during the past month (2 recovery events), and a total of 232.76 gallons have been bailed since the start of the NAPL recovery program in June 19, 2004. The two-week recovery schedule was started October 25, 2005.
- A total of 1,395,000 gallons of ground water were recovered by the existing extraction system, treated and discharged to the Gainesville Regional Utilities (GRU) during this past month (operating period of 727.7 hours). The average recovery rate for the month was approximately 31.9 gallons per minute (gpm).

3. SUMMARY OF ALL PLANS, REPORTS, DELIVERABLES AND PROCEDURES COMPLETED:

- Completed monthly maintenance check.
- Inspected piezometers, extraction wells, piping, valves, treatment plant vessels and controls, buildings and grounds.
- Repaired/replaced EW-6, EW-10, and EW-11 pumps.
- Cleaned static mixer.
- Shipped 21 drums of groundwater treatment sludge.
- All offsite Hawthorn monitoring wells have been completed, developed, and sampled except HG-22D.
- Submitted Surficial Aquifer Redevelopment/Resampling Report.
- Conducted 4th quarter Upper Floridan sampling.
- Conducted Second Semiannual Stage 2 Groundwater sampling.
- Conducted additional Hawthorn monitoring well sampling.
- Conducted second Joint EPA/Beazer Feasibility Study meeting/workshop to develop a list of remedial alternatives for evaluation.

4. PROJECTED WORK FOR THE NEXT MONTH (JANUARY 2008) WITH SCHEDULE CONSIDERATIONS:

(Please see the attached draft schedule. Note that this is a working schedule and is likely to change.)

- Measure instantaneous flow rates and totalizer volumes for each extraction well.
- Continue NAPL removal from Hawthorn Group wells on a two-week schedule.

- Continue well installation activities at HG-22D.
- Continue Hawthorn NAPL recovery pilot test construction activities.
- Conduct ISBS pilot test injection activities.

5. SUMMARY OF PROBLEMS OR POTENTIAL PROBLEMS AND ACTUAL OR ANTICIPATED DELAYS ENCOUNTERED DURING THE MONTH:

- A public-utility sewer line was accidentally damaged during drilling of Hawthorn Group well HG-22D just west of the site property line. The incident has caused minor delays in the drilling program.

6. ACTIONS BEING TAKEN TO RECTIFY PROBLEMS OR DELAYS:

- Gainesville Regional Utilities (GRU) and GeoTrans have communicated frequently regarding the incident at HG-22D.

7. SUPPLEMENTAL INFORMATION:

- Please see the attached draft schedule. Note that this is a working schedule and is likely to change.

8. CHANGES IN PERSONNEL DURING THIS MONTH:

- None this reporting period.

Cabot Carbon/Koppers Site: Combined Beazer USEPA Schedule (DRAFT FOR DISCUSSION)

| ID | Task Name | Duration | Start | Finish | Predecessors | 2006 | | | | | | | | | | | | 2007 | | | | | | | | | | | | 2008 | | | | | | | | | | | |
|----|--|-----------------|-----------------|-----------------|------------------------|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| | | | | | | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Jan | Feb | Mar |
| 50 | Beazer Conduct Modified Aug 18 2006 Workplan | 222 days | 12/11/06 | 10/22/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 51 | Drilling, Installation, Testing | 152 days | 12/11/06 | 7/13/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 52 | Sampling | 5 days | 7/16/07 | 7/20/07 | 51 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 53 | Analysis | 20 days | 7/23/07 | 8/17/07 | 52 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 54 | Report Prep & Review | 45 days | 8/20/07 | 10/22/07 | 53 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 55 | Beazer Submit Floridan Supplemental Analysis Report | 0 days | 9/17/07 | 9/17/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 56 | Beazer Submit Floridan Drilling & Analysis Reports | 0 days | 10/22/07 | 10/22/07 | 54 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 57 | USEPA/Stakeholder Review | 25 days | 10/23/07 | 11/28/07 | 56 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 58 | Resolution of Remaining Issues | 25 days | 12/14/07 | 1/22/08 | 57 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 59 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 60 | Recmnd. #5 - Pilot Studies and Interim Measures | 742 days | 5/1/06 | 3/27/09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 61 | Hawthorn DNAPL Rec. Pilot/IM | 403 days | 11/17/06 | 6/17/08 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 62 | USEPA Approval to Proceed with 12/23/04 Workplan (11/17/06 letter) | 0 days | 11/17/06 | 11/17/06 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 63 | Resolution of Permitting & Comments | 107 days | 11/17/06 | 4/17/07 | 62 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 64 | FDEP UIC Permit Exemption | 0 days | 4/25/07 | 4/25/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 65 | Beazer Prepare Revised Workplan | 20 days | 4/25/07 | 5/22/07 | 64 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 66 | Beazer Submit Revised Workplan | 0 days | 5/22/07 | 5/22/07 | 65 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 67 | Beazer Conduct Workplan | 271 days | 5/23/07 | 6/17/08 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 68 | Design & Procure | 40 days | 5/23/07 | 7/19/07 | 66 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 69 | Mobilize | 5 days | 8/13/07 | 8/17/07 | 68 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 70 | Field Install | 130 days | 8/20/07 | 2/25/08 | 36,69 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 71 | Operational Period | 45 days | 2/26/08 | 4/28/08 | 70 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 72 | Prepare Report | 35 days | 4/29/08 | 6/17/08 | 71 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 73 | Beazer Submit Report | 0 days | 6/17/08 | 6/17/08 | 67 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 74 | ISBS Pilot/IM | 547 days | 5/1/06 | 6/17/08 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 75 | USEPA/Stakeholder Review of 4/22/05 Work Plan | 238 days | 5/1/06 | 3/29/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 76 | USEPA Transmittal of USACE Analysis (at 3/29/07 meeting) | 0 days | 3/29/07 | 3/29/07 | 75 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 77 | Resolution of Path Forward | 42 days | 3/30/07 | 5/29/07 | 76 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 78 | EPA Approval of ISBS Workplan (Miller email, 5/26/07) | 0 days | 5/29/07 | 5/29/07 | 77 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 79 | UIC Information Submittal to FDEP | 0 days | 8/7/07 | 8/7/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 80 | Revised Workplan & UIC Variance Request | 0 days | 10/8/07 | 10/8/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 81 | FDEP UIC Variance Review Process | 68 days | 10/8/07 | 1/16/08 | 80 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 82 | FDEP UIC Permit Exemption Granted | 0 days | 1/16/08 | 1/16/08 | 81 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 83 | Conduct Workplan | 244 days | 7/2/07 | 6/17/08 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 84 | Final Design & Procurement | 1 mon | 7/2/07 | 8/1/07 | 78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 85 | Baseline Sampling & Construction | 6 wks | 9/7/07 | 10/18/07 | 84,36 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 86 | ISBS Implementation | 5 days | 1/22/08 | 1/28/08 | 85,82 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 87 | First Sampling Event & Analysis | 8 wks | 1/29/08 | 3/24/08 | 86 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 88 | Second Sampling Event & Analysis | 8 wks | 3/25/08 | 5/19/08 | 87 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 89 | Report Prep & Review | 4 wks | 5/20/08 | 6/17/08 | 88 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 90 | Beazer Submit ISBS Pilot Study Report | 0 days | 6/17/08 | 6/17/08 | 89 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 91 | Surficial DNAPL Recovery Pilot/IM | 525 days | 3/1/07 | 3/27/09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 92 | Beazer Prepare Work Plan | 150 days | 3/1/07 | 10/1/07 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 93 | Beazer Submit Work Plan | 0 days | 3/31/08 | 3/31/08 | 92,130FS+5 day: | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 94 | USEPA/FDEP/Stakeholder Review | 25 days | 4/1/08 | 5/5/08 | 93 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 95 | Resolution of Issues | 25 days | 5/6/08 | 6/10/08 | 94 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 96 | USEPA Approval | 0 days | 6/10/08 | 6/10/08 | 95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 97 | UIC Permit Exemption | 0 days | 6/10/08 | 6/10/08 | 95 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 98 | Beazer Conduct Workplan | 200 days | 6/11/08 | 3/27/09 | 97,96 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

Date: 1/18/08
Current/In-Progress Item
Completed Major Task

| | | | | | | | | | |
|-------|--|-----------|--|-----------------|--|--------------------|--|----------|--|
| Task | | Progress | | Summary | | External Tasks | | Deadline | |
| Split | | Milestone | | Project Summary | | External Milestone | | | |

