

Beazer

BEAZER EAST, INC. C/O THREE RIVERS MANAGEMENT, INC.
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August 10, 2005

Mr. Winston Smith
Director, Waste Management Division
United States Environmental Protection Agency
Region IV
61 Forsythe Street, SW
Atlanta, GA 30303

RE: USEPA August 4, 2005 Letter
Floridan Monitoring – Additional Well Installation
Cabot Carbon/Koppers Superfund Site, Gainesville, Florida

Dear Mr. Smith:

The intent of this letter is twofold: 1) to acknowledge the EPA August 4, 2005 letter of technical clarification regarding concerns we have expressed with some aspects of the EPA's Revised Floridan Aquifer Monitoring Plan Addendum ("*EPA's Floridan Monitoring Addendum*") that was attached to the EPA's July 12, 2005 letter to Beazer; and 2) to notify EPA, as per the 1991 UAO and your request, that Beazer intends to implement *EPA's Floridan Monitoring Addendum*.

With regard to the technical clarifications provided in your letter, and as per conversations we have had recently with both your technical and legal staffs, we feel it is imperative that technical representatives from Beazer and EPA meet in the near term to discuss more specific and detailed procedures for the installation of the four "source-area" wells and for the installation of the multi-level sampling equipment, as well as for clarification of other, less pressing issues we identified in our July 27, 2005 letter. Our objective for this meeting would be to make sure that Beazer and EPA are in agreement with contingency measures to be undertaken based on field observations made during the drilling and installation of the "source-area" wells in order to provide sufficient protection of the Floridan aquifer, as well as to make sure both parties are aware of the timing issues and installation requirements for the multi-level sampling equipment.

We are committed to implementing both the source-area well installation and the multi-level sampling equipment. This commitment is made based on the premise that the technical meeting will provide both parties with a level of assurance that the well-installation procedures will adequately protect the Floridan aquifer, and that the installation of the multi-level sampling equipment will be performed consistent with realistic capabilities and expertise of the contractors implementing this program.

As you are aware, our contractors are already in the field, implementing the drilling of the eight downgradient transect wells consistent with *EPA's Floridan Monitoring Addendum*. We propose to meet in the near-term with no intended effect on the continuity of this ongoing work, or the completion of the program, and will propose an agenda to EPA in advance of the meeting. We

propose that at the conclusion of that meeting, and based partially on the progress of the ongoing field effort, we can agree on a schedule for completion of the work as well. Mr. Michael Slenska of Beazer will arrange this meeting with Ms. Amy Williams of your staff.

As always, we request that EPA place this letter in the Administrative Record for the Site. If you should have questions or require additional information, please call me at 412-208-8812 or Michael Slenska at 412-208-8867.

Very truly yours,



Robert S. Markwell
Vice President

cc: Amy Williams, EPA
Jill Blundon
Mike Slenska
Mitch Brouman
Linda Paul, KI