

## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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May 19, 1997

Mr. Robert Markwell, Program Manager  
Beazer East, Inc.  
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Pittsburg, PA 15219

File Ref: FID#816009810  
Douglas County  
HW LIC/CA Files

SUBJECT: Koppers Industries, Inc. (KII)/Beazer East, Inc. (Beazer)  
Douglas County, Wisconsin - WID#006179493  
WDNR Project Management Transfer and Comments Regarding the Status of the  
ch. NR 635 Groundwater Monitoring Program at the Closed RCRA Surface  
Impoundments and the Facility Wide Corrective Action Program Activities.

Dear Mr. Markwell:

I am writing to formally notify you that effective April 27, 1997, Marty Herrick and I are no longer the assigned project managers for the Hazardous Waste and Corrective Action Program activities at the Koppers Industries, Inc. (KII), facility in Superior, WI. The new assigned project managers are Tom Kendzierski (Spooner, WI - ph# 715-635-4057), and Jim Hosch (Superior, WI - ph# 715-392-0802). Generally, Tom will be the project manager for the on-site soil and groundwater investigation and remediation activities at the facility, while Jim will be the project manager for the off-site surface water and sediment investigation and remediation activities. Tom Kendzierski will be reviewing and responding to the following in-house and pending documents:

- \* Technical Memorandum on Soil Risk Procedures
- \* Site-Wide Corrective Action Monitoring Program and Request for Permit Modification
- \* 1996 RCRA Annual Groundwater Monitoring Report
- \* Private Water Supply Well Sampling Results
- \* Pending Phase III Soil and Groundwater Monitoring Report

Please note in the Department's October 24, 1996 plan approval modification, condition #12 required Beazer to submit a Corrective Measures Study (CMS) within 60 days of submittal of the RFI Phase III soil and groundwater investigation report. The Department has decided that Beazer should wait to submit the CMS until after the Department has had a chance to review and comment on the "Technical Memorandum on Soil Risk Procedures". Therefore, Beazer will now be required to submit a CMS (that meets the relevant requirements of sections A and C of the Department's Task II guidance document), within 60 days of receiving the Department's comments on the "Technical Memorandum on Soil Risk Procedures" or within 60 days of submittal of the Phase III soil and groundwater investigation report, whichever is later.

Jim Hosch (along with Tom Janisch - WDNR Watershed Management), will be responding to the Preliminary Characterization Report for Surface Water and Streambed Sediment. They will also be

working with Henry Nehls Lowe (WI. Department of Health and Family Services), to evaluate the reported contamination in the "unnamed ditch" and Crawford Creek. Henry Nehls Lowe will also be assisting in the evaluation of the reported soil and groundwater contamination detected across the facility.

I have reviewed the "1995 RCRA Annual Groundwater Monitoring Report", which is generally satisfactory. I would like to take this opportunity to provide you with the following comments regarding the overall groundwater monitoring program for the RCRA surface impoundments.

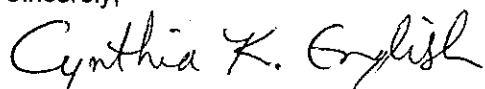
1. Please be reminded that Beazer is required to submit its quarterly groundwater monitoring submittals within 60 days of the date of sampling, unless approved otherwise by the Department.
2. Beazer must include a site map with each quarterly groundwater monitoring submittal, showing the location of all monitoring wells.
3. The summary tables provided in the annual monitoring report for all quarterly data are very useful and should continue to be provided. In addition to the cover letter, Beazer must also provide summary tables for all detected constituents (not just ch. NR 140, Wis. Adm. Code standard exceedances), with the quarterly monitoring submittals. There are many constituents of concern that do not currently have ch. NR 140, Wis. Adm. Code standards and they must be clearly brought to the attention of the WDNR in the cover letter narrative and summary tables.
4. In accordance with s. NR 140.16(2), Wis. Adm. Code, Beazer is required to use acceptable laboratory methods that have limits of detection (LOD) and limits of quantitation (LOQ) below the ch. NR 140, Wis. Adm. Code Preventive Action Limits (PALs) or produces the lowest available LOD and LOQ, if the LOD and LOQ are above the PAL. Beazer must provide an explanation and justification for any constituents with an LOD and/or LOQ above the PAL, in the cover letter to each quarterly submittal. In accordance with ch. NR 140.16(5), Wis. Adm. Code, Beazer is required, at a minimum, to report the LOD and the LOQ with the sample results, for all constituents listed in Table 1 of ch. NR 140, Wis. Adm. Code. This must include the 17 congeners of Dioxin and Dibenzofuran, since the congeners are compared in toxicity equivalents to the PAL for 2,3,7,8-TCDD. The Department has attached a guidance document for determining these method LODs and LOQs.
5. Beazer should upgrade its electronic data submittals in accordance with the attached guidance dated July 30, 1996 (cover letter dated July 31, 1996). It is important that Beazer immediately begin using the revised parameter codes if it has not been doing so already. Beazer must notify the Department of all constituents under its groundwater monitoring program that do not have parameter codes assigned to them so that codes can be assigned as soon as possible. Meanwhile, the information that is compiled electronically for constituents with parameter codes, must also be compiled and submitted (tabular format), in hard copy form for those constituents that do not have parameter codes.
6. In its next progress report, Beazer should provide a summary of the abandonment of MW-27A, and the potential need to replace this well. Beazer should also provide a summary of the abandonment of selected on-site private water supply wells and the subsequent installation of replacement wells. This summary should also address any cross-contamination concerns that may still be present at depth as a result of the now abandoned on-site private water supply wells.
7. On page 1 of the 1995 RCRA Annual Groundwater Monitoring Report, Beazer noted that a flow net analysis and isoconcentration maps will be addressed as part of the ongoing RCRA Facility

Investigation. Please note that soil isoconcentration maps are also required per the U.S. EPA's July 11, 1994 letter conditionally approving the Phase III RFI workplan.

8. It should be noted that the Department has not yet required Beazer to begin performing the statistical analyses outlined in ch. NR 635, Wis. Adm. Code (for facilities in compliance monitoring). If the authority and requirements under the Department's RCRA Corrective Action Program and ch. NR 140, Wis. Adm. Code, are not adequate to address detects in the ch. NR 635, Wis. Adm. Code monitoring wells, then Beazer may be required to perform the statistical analyses in the future.

Finally, Tom Kendzierski and Jim Hosch will be contacting you in the future regarding investigation and remediation activities at the Koppers site in Superior, but please feel free to contact them at any time if you have any questions or comments regarding the project. If you have not done so already, please contact Tom Kendzierski immediately to provide him with the date that the Phase III RFI soil and groundwater investigation report will be submitted. In addition, please send another copy of the "Preliminary Characterization Report for Surface Water and Streambed Sediment", to Tom Janisch at the WDNR, Bureau of Watershed Management, 101 South Webster Street, Madison, WI, 53702. Further, if you have any follow-up questions regarding the transferred WDNR project management of the Hazardous Waste and Corrective Action activities at your facility to the Northern Region, please feel free to contact me at (608) 275-3240.

Sincerely,



Cynthia K. English, P.G., Hydrogeologist  
Remediation and Redevelopment Unit  
South Central Region

cc: Pat McCutcheon - SCR R&R  
Mark Gordon - RR/3  
Marty Herrick - WA/3  
Tom Janisch - WT/2  
Henry Nehls Lowe - Department of Health & Family Services (Room 96)  
Tom Kendzierski - Northern Region (Spooner)  
Jim Hosch - Northern Region (Superior)  
Steve LaValley - Northern Region (Superior)  
Gary LeRoy - Northern Region (Spooner)  
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