

MEMORANDUM



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MAY 22 2002  
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MAY 31 2002  
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To: Jim Hosch, John Robinson, Steve LaValley, Mark Gordon (WDNR); Jane Patacity (Beazer); Linda Paul, Tim Ries (KII)

Date: 5/24/02

cc: R. Anderson  
R. Bauer  
B. Magee  
M. Wheeler, Jr.

From: Jeffrey S. Holden, P.E. *JS*

Re: Superior, WI Site – Summary of 5/2/02 Project Meeting

On May 2, 2002, a meeting was held at the Wisconsin Department of Natural Resources (WDNR) office in Superior, Wisconsin to discuss the corrective action activities at the Koppers Industries, Inc. (KII) Superior, Wisconsin facility. The meeting was initiated at approximately 9 a.m., and was attended by representatives of the WDNR, KII, Beazer East, Inc. (Beazer), and BBL, as follows:

- WDNR: Jim Hosch, John Robinson, Steve LaValley, and Mark Gordon (by telephone from the WDNR's Spooner office)
- KII: Linda Paul and Tim Ries
- Beazer: Jane Patacity
- BBL: Rob Anderson and Jeff Holden

BBL provided a handout of discussion items to be addressed during the meeting. A copy of this handout is attached to this memorandum.

Key discussion items from the meeting are summarized below. A list of action items is also provided.

**Key Discussion Items**

- A wetland assessment/delineation for the entire KII property is expected to start in May 2002 and may require up to six weeks to complete, including field work, survey, and reporting. The primary purpose of the wetland delineation is to facilitate identification of a suitable location for the proposed Corrective Action Management Unit (CAMU).
- AMEC, on behalf of Beazer, is currently modeling dioxin/furan bioaccumulation in fish of Crawford Creek and the Nemadji River. A summary of the modeling is expected to be submitted to the WDNR and Wisconsin Department of Health and Family Services (WDHFS) in the next few weeks.
- As previously discussed, access to one additional private property is necessary to implement the Crawford Creek floodplain investigations proposed in the July 25, 2001 Work Plan. That property is currently undergoing a property transfer. Beazer will coordinate with the new property owner in a continued effort to obtain an access agreement for this property.
- The WDNR indicated that a Mr. Zakowski contacted them regarding warning signs posted along Crawford Creek. As a follow-up to the meeting, BBL determined that Mr. Zakowski owns property

along Crawford Creek on the south side of Hammond Avenue, and that warning signs had unnecessarily been posted along this portion of the creek. Three signs were located and removed from this property.

- The WDNR requested that .pdf versions of submittals (letters, etc.) be submitted in conjunction with hard copies to facilitate routing within the department.
- The following CAMU-related issues were discussed:
  - The WDNR confirmed that they generally approve of the proposed use of a CAMU at the site;
  - The CAMU application can be advanced concurrently with the corrective measures studies (CMS) for on- and off-site areas. The CAMU does not need to be postponed until the CMS is complete (intent is to implement as an interim measure consistent with final corrective action for the site);
  - Beazer agreed to provide milestones as a roadmap for "how to get there" with respect to performing the CMS concurrent with the CAMU;
  - The presence or absence of wetlands within the proposed CAMU area will affect the CAMU permitting process. If wetlands exist, then NR 103 requirements would need to be addressed. WDNR needs to have a wetlands assessment in hand prior to approving the CAMU;
  - Additional information regarding physical and engineering properties of the materials subject to consolidation (e.g., water content) must be provided before the WDNR approves the conceptual design. It was agreed that these issues would be further discussed after the wetland assessment/delineation is complete; and
  - WDNR can provide conceptual approval of the CAMU with information on wetlands, volume, size, and the need for leachate collection.
- In a letter to the WDNR dated April 19, 2001, Beazer identified proposed modifications to the current groundwater monitoring program. The letter included detailed information regarding the scope of and basis for the proposed changes (a summary of the proposed changes is provided on the attached list of discussion items). The WDNR had not yet performed a detailed review of the proposed modifications, but expected to complete the review by June 21, 2002. In the interim, it was agreed that the June quarterly monitoring event could be delayed until July. If the WDNR concurs with the proposed modifications, including a change from quarterly to semi-annual monitoring, the July event would be eliminated. The proposed modifications represent a Class 2 permit modification, so the changes will be subject to a public comment period before becoming final. The WDNR agreed to defer the current groundwater program pending public comment and finalization.
- In a letter to Beazer dated April 11, 2002, the WDNR issued comments regarding the July 25, 2001 work plan. Beazer addressed those comments, to the extent possible, in a response dated April 30, 2002. As a result of this correspondence, Beazer will coordinate directly with Mr. Goettel (the WDNR's Water Management Specialist) regarding potential permit requirements for work in the Crawford Creek floodplain (wetland) area. Also, additional samples will be collected beneath the layer of visibly affected materials in conjunction with the proposed test pit excavations.
- The April 12, 2002 letter report to the WDNR summarized analytical data for sediment samples collected from the on-site fire pond in December 2001. The April 30, 2002 letter provided data for previous pond sediment samples collected by KII. The two sampling events indicate consistently low concentrations of site-related constituents and no consistent trends of increasing concentrations with depth. Based on these results, Beazer does not expect to perform additional sampling of the fire pond sediments.

- Mr. Goettel is leaving the WDNR as of early August 2002. Since a replacement is not anticipated in the short term, the WDNR suggests that wetland-related issues and approvals be addressed as soon as possible.
- Beazer is currently preparing an Environmental Indicator (EI) assessment for the site in accordance with procedures established by the United States Environmental Protection Agency (USEPA). The draft EI will be forwarded to the WDNR for review and comment within the next few weeks. Pending WDNR concurrence with the conclusions of the EI assessment, the assessment can be forwarded by the WDNR to the USEPA to be reflected within the RCRA Corrective Action database.
- Beazer will submit the plan review fee (\$1,800) associated with the CAMU Application, which represents a Class 2 permit modification. This fee will be applicable for the entire CAMU application process, until such time that the permit modification may be issued.

**Action Items**

- Beazer will perform the on-site wetland assessment/delineation and submit the associated report as soon as possible. The target completion timeframe will be July 1, 2002, such that the findings can be discussed with the WDNR during a project meeting to be scheduled in July 2002.
- Beazer will complete the EI assessment and the dioxin/furan modeling for fish and submit those items to the WDNR in the next few weeks.
- The WDNR will provide comments regarding the preliminary project schedule that was submitted on July 3, 2002.
- BBL/Beazer will coordinate with Mr. Goettel to expedite the wetlands schedule so that work may progress in the Crawford Creek floodplain area.
- When feasible and appropriate, BBL will submit .pdf versions of documents in conjunction with hard copies.

Please feel free to contact me with any questions or comments regarding this summary.

JSH/MEG

Koppers Industries, Inc. (KII) Wood-Treating Facility  
Superior, Wisconsin

**May 2, 2002 Project Meeting – Discussion Items**

- Follow-up from Previous Meeting
  - Wetland assessment/delineation in proposed CAMU area
  - Beazer assessment of potential dioxin/furan bioaccumulation in sport fish
  - Property access requests
  - Revised WDNR distribution list
  - WDNR comments regarding proposed schedule
- CAMU Application
  - WDNR 1/23/02 comment letter
  - Beazer's 4/15/02 response letter
  - Submittal of CMS prior to revised CAMU Application
  - Evaluation of Corrective Action Alternatives
  - Need for liner and leachate collection
  - Other design- and implementation-related issues
  - Next steps
- Proposed Modifications to Groundwater Monitoring Program
  - Modifications proposed in 4/19/02 letter from BBL to WDNR
  - Revised SAP
  - Proposed changes include:
    - Quarterly to semi-annual monitoring frequency
    - Consistent use of Method 8270C for SVOC analyses
    - Naphthalene Analysis by Method 8270C in lieu of Method 8021B
    - Eliminate Metals from the Analyte List
    - Decommission well W-04C and replace with sampling at monitoring at well W-28C
    - Eliminate well W-07C from the sampling program
    - Eliminate well W-09C from the sampling program
    - Low-flow sampling instead of bailing
  - Schedule for implementation
- Crawford Creek Channel/Floodplain Investigations
  - WDNR 4/11/02 comment letter
  - 4/12/02 summary report
  - 4/30/02 response to WDNR comments
  - Wetland permits/coordination
  - Property access approval status
  - Additional sampling/analysis for dioxins/furans
- Environmental Indicator (EI) Assessment
  - EI assessment being performed by Beazer on behalf of WDNR
  - Preliminary findings
  - WDNR filing with USEPA
- Schedule