BBL
BLASLAND, BOUCK & LEE, INC.
engineers & scientists

Transmitted Via Federal Express

January 8, 2003

Mr. James Hosch
Wisconsin Department of Natural Resources
1401 Tower Avenue
Superior, WI 54880

Re: KII Superior, WI Facility – Wetland Delineation Report and Revised Proposal for CAMU Siting
BBL Project #: 388.32.002 #2

Dear Mr. Hosch:

As a follow-up to our project meeting in Superior in May 2002, Beazer East, Inc. (Beazer) performed a wetland assessment/delineation at the Koppers Industries, Inc. (KII) Superior, Wisconsin facility. The purposes of the wetland assessment/delineation were to determine the presence and extent of regulated wetland areas and to assess their implications on the location of the proposed Corrective Action Management Unit (CAMU) at the site. This letter summarizes the findings of the wetland assessment/delineation activities, transmits a copy of the *Wetland Delineation Report for the Koppers Industries, Inc. Superior, Wisconsin Facility* (Wetland Delineation Report), discusses implications regarding the previously-proposed and alternate CAMU locations, and identifies the proposed CAMU location that has been selected based on the findings of the wetland assessment/delineation.

The attached site plan (Figure 1) identifies the delineated wetland boundaries and the previously-proposed, considered, and preferred CAMU locations. These locations are further discussed below.

Summary of Wetland Assessment/Delineation Activities

The wetland assessment/delineation activities were conducted by Environmental Troubleshooters, Inc. (ETI) of Duluth, Minnesota in July 2002. The entire area located within the facility's property boundaries (approximately 104 acres) was assessed for the presence of wetland areas. Wetland boundaries were delineated based on observed soil, vegetative, and hydrologic characteristics. The delineated wetland boundaries were subsequently surveyed by L.W. Survey Engineering and Design Company of Duluth, Minnesota. The resulting delineated wetland boundaries are shown on Figure 1 and on the site map in Appendix 2 of the enclosed Wetland Delineation Report. In summary, ETI determined that three predominant wetland areas, consisting of four wetland types, were present at the KII facility: Wetland Meadow (Type 2), Shallow Water Marsh (Types 3 and 4), and Shrub Swamp (Type 6). The total acreage of wetland areas at the site was determined to be approximately 26 acres (i.e., about 25% of the KII facility property).

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Additional details regarding the wetland assessment/delineation are provided in the enclosed Wetland Delineation Report.

CAMU Locations

The *Request for Modification of the Closure and Long-Term Care Plan Approval and Corrective Action Management Unit ("CAMU") Demonstration* (CAMU Demonstration Report; BBL, May 2000) originally identified the former landfarm area as the proposed location for siting the CAMU. In the interim, and as we have discussed, this location is no longer acceptable to KII (the current property owner and operator) due to its proximity to County Road A. As shown on Figure 1, a portion of this area also contains wetlands. As a result of these considerations, alternate areas of the KII facility have been considered for siting the CAMU.

Given the need to avoid active work areas of the KII property, the former sprayfield was subsequently discussed as a potential CAMU location. However, as indicated on Figure 1, the entirety of the former sprayfield area is located within a wetland. While this may not preclude siting the CAMU in the former sprayfield area, it would likely complicate the design, permitting, and mitigation requirements. Therefore, this area is not currently being considered for siting the CAMU.

Based on the results of the wetland assessment, two other potential CAMU locations have been considered. The first is the area north of the closed surface impoundments and the second is an undeveloped area located between the railroad tracks and the property boundary in the southwest corner of the KII facility.

The area north of – and potentially including – the closed surface impoundments was considered as a potential CAMU location primarily because this area is already impacted (a preferred CAMU location is one that has been previously impacted by the site) and because it includes a fairly large, contiguous non-wetland area. However, the potential capacity of this area is limited by the presence of drainage-ditch-type wetlands to the west, north, and east of this area, and by current uncertainty associated with the ability to construct a containment cell on top of the closed impoundments. Also, construction in this area would require an increased level of disruption to the active facility operations. Additionally, the area north of the closed surface impoundments represents the only potential area for future expansion of KII's operations in the vicinity of the current process area. For these reasons, KII has indicated that this is not an appropriate location for siting the CAMU.

The undeveloped area in the southwest portion of the facility represents the largest contiguous tract of non-wetland area at the facility. Sufficient space is available within this area to construct a CAMU with the necessary design capacity. In addition, this area is located away from public roadways (a concern of KII for the landfarm area) and the presence of a CAMU in this area is unlikely to affect current or future operations at the KII facility. Although there is no indication that this area has been impacted from past releases from the site, NR 636.40(3)(c) allows for siting of a CAMU in unimpacted areas of a facility if siting the CAMU in these areas is more protective than siting the CAMU in impacted areas. Constructing the CAMU in the southwest portion of the facility would be equally protective from a human exposure perspective, but would be more protective of wetland areas at the site. Therefore, siting the CAMU in this area would be more protective than siting the CAMU in other areas of the site that contain wetlands. For these reasons, the southwest portion of the facility has been selected as the preferred location for siting the CAMU.

Please note that the "preferred" location and configuration of the CAMU shown on Figure 1 is preliminary, and is subject to modification (within the same general area) based on area-specific considerations. Such considerations may include accessibility from existing roads, ability to cross existing railroad tracks, minimizing the amount of vegetative clearing, presence of subsurface utilities, etc. These considerations would be further reviewed during the design process pending WDNR concurrence with the general approach for siting the CAMU in this portion of the site.

Following your review of the enclosed materials, Beazer would like to discuss the findings of the wetland assessment/delineation and the proposed CAMU location during our project meeting scheduled for January 17, 2003. Please contact Jane Patarcity (412-208-8813) or me (860-249-7111) with any questions or comments.

Sincerely,

BLASLAND, BOUCK & LEE, INC.

Jeffrey S. Holden, P.E.
Manager

DGB/csc
Enclosures

cc: Mark Gordon, Wisconsin Department of Natural Resources
John Robinson, Wisconsin Department of Natural Resources
Steve LaValley, Wisconsin Department of Natural Resources
Jane Patarcity, Beazer East, Inc.
Patrick Stark, Koppers Industries, Inc.
Robert J. Anderson, Blasland, Bouck & Lee, Inc.

PREFERRED CAMU LOCATION

OPTIONAL EXTENT OF ALTERNATE CAMU LOCATION CONSIDERED

ALTERNATE CAMU LOCATION CONSIDERED

PROPERTY BOUNDARY

FORMER LEAD TRACK LANDFILL (AREA H)

STRAW BALES (AREA G)

DRIP TRACK AREA (AREA F)

FORMER UNLINED LANDFILL/LANDFARM (AREA B)

A&B MILL

BATH HOUSE

CLOSED SURFACE IMPOUNDMENTS (AREA C)

UNNAMED DITCH

FLOW

HAMMOND AVENUE

TREATMENT BUILDING

SHOP

FIRE POND

CONTAINER STORAGE FACILITY

CONCRETE BERM

TREATMENT AREA (AREA B)

OFFICE

GATE

COUNTY ROAD A

COUNTY ROAD Z

ORIGINALLY PROPOSED CAMU LOCATION

LEGEND:

EXISTING WETLAND AREA

NOTES:

1. BASE MAP AND TOPOGRAPHY OBTAINED FROM PHOTOGRAMMETRY PERFORMED BY LOCKWOOD MAPPING COMPANY OF ROCHESTER, NY (12/28/01).
2. WETLAND BOUNDARIES DELINEATED BY ENVIROMENTAL TROUBLESHOOTERS, INC. OF DULUTH, MN. AND SUBSEQUENTLY SURVEYED BY L.W. SURVEY ENGINEERING & DESIGN COMPANY OF DULUTH, MN.
3. ALL LOCATIONS ARE APPROXIMATE.

0 150' 300'
GRAPHIC SCALE

BEAZER EAST, INC.
PITTSBURGH, PENNSYLVANIA
KOPPERS INDUSTRIES, INC. FACILITY
SUPERIOR, WISCONSIN

EXISTING WETLAND BOUNDARIES AND POTENTIAL CAMU LOCATIONS

BBL BLASLAND, BOUCK & LEE, INC. engineers & scientists

FIGURE 1

X: 38832X01.DWG
L: ON=*, OFF=REF
P: PAGESET/PLT-DL
1/8/03 SYR-54-RCB
38832002/38832801.DWG