

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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February 27, 2006

Ms. Jane Patarcity
Beazer East, Inc.
One Oxford Centre, Suite 3000
Pittsburgh, PA 15219-6401

Subject: Comments on Summary of Supplemental Groundwater Monitoring and Natural Attenuation Evaluation, Koppers Inc., Superior, Wisconsin Facility
BRRTs: 02-16-000484

Dear Ms. Patarcity:

The Department is in a receipt of a report titled, "Summary of Supplemental Groundwater Monitoring and Natural Attenuation Evaluation". The Department received the report on Jan 25, 2006. In brief, the report provides a summary of the field work, groundwater flow conditions, a trend analysis and conclusions regarding Natural Attenuation.

In order to use natural attenuation as a stand alone remedy in Wisconsin source soil and aqueous phase liquid (product) removal where it exists must be removed, it must address contaminants of concern, and sufficient site specific monitoring data must be provided to the Department to demonstrate natural attenuation will restore the groundwater to NR 140 Wis. Adm. Code Standards. Please be advised that the Department does not allow natural attenuation without adequate monitoring.

In order to assist you in meeting these requirements we are providing the following comments:
As in previous correspondence we consider dioxins, volatile organic compounds, polynuclear aromatic hydrocarbons, and phenolic compounds to be contaminants of concern at this site. The Evaluation provides only information regarding PAHs, and phenolic compounds. If the dioxins or volatile organic compounds are not impacting groundwater at levels that require remediation please provide adequate discussion and data or references to the reports which provide that data which support your conclusion.

A review of the data provided in this report indicates that there are as many as three areas of the site, each having some compound(s) which exceeds the s. 140.10 Wis. Adm. Code Standard. It is not clear from the monitoring network and the data provided, if these are individual plumes or plumes that have zones of intermixing.

The first area is the closed RCRA surface impoundments which have attained concentrations of PAHs which exceed enforcement Standard levels at W-10AR2 and W-30A. Downgradient of this location is W-02C which has attained the Preventive Action Limit for pentachlorophenol. Benzene has been found in W10-AR above the Enforcement Standard please inform us how this will be remediated. Mann-Kendall analysis for pentachlorophenol and total methylnaphthalene data from W-30A indicates the plume is decreasing at the 80 percent confidence interval. The Mann-Kendall analysis indicates that naphthalene and total PAHs are decreasing at the 90 percent confidence interval.

The second area identified is near the container storage facility. W-16A has levels of PAHs which are indicative of free product. Northeast of this location is W-18D which has exceeded the PAL for pentachlorophenol, there is no clean well downgradient of this location. The Department requires removal or active removal of free product and reduction of soil source concentrations which preclude reasonable restoration timeframes by natural attenuation. Removal as suggested by the Focused Corrective Measures Study may assist you in meeting this goal. Further plume definition is plume is necessary at this location. We are requesting additional wells at side gradient locations to monitoring well W-16A. In addition, we are requesting that future monitoring of W-33D include natural attenuation parameters at W-33D be included to verify whether this location is actually downgradient. Natural attenuation should be affecting indicator parameter concentrations if this well is downgradient of the plume. In the event that it cannot be established that W-33D is a downgradient location an additional monitoring well may be required. Mann-Kendall analysis indicates W-16 is stable for total PAHs, and naphthalene.

The third area is the Straw Bales Area and Former Unlined Landfill Area. It is not possible to determine from the existing groundwater monitoring network whether the exceedances for pentachlorophenol at W-25A and at W-14A are part of a single plume or two distinct plumes. No upgradient wells exist for these areas, there 690 feet between the two wells, and the nearest downgradient well is close to 900 feet away. Mann-Kendall analysis indicates the plume is unstable at 14A. Mann-Kendall at W-25A is stable for pentachlorophenol and decreasing for naphthalene and total PAHs at the 80 percent confidence level.

We request that a time vs. concentration graph for each well for each compound that has attained the enforcement standard in the last twelve months. This information will be used to further evaluate natural attenuation and seasonal trends at the site.

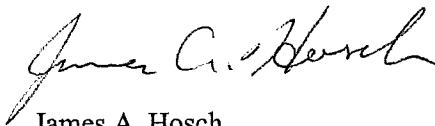
An isoconcentration map for PAHs and pentachlorophenol each should be provided as requested in our previous correspondence. Figure 2 provides a conceptual plan view of the plume. As stated earlier we are in need of site specific data to evaluate attenuation of the contaminants at the site. As such we are requesting the natural attenuation indicator parameters be provided on isoconcentration map(s) for the site. This would assist in our evaluation of natural attenuation and well placement.

Pentachlorophenol is left off of Table 8; please provide us a revised Table 8.

Please provide us your plans to expand the monitoring well network for the site within 60 days of this letter. The letter should provide the maps, corrected tables and any other requested additional information.

Thank you for the opportunity to comment on this report, should you have any questions regarding this letter, please feel free to contact me at 715-392-0802.

Sincerely,
NORTHERN REGION



James A. Hosch
Hydrogeologist

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