

**State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES**

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April 24, 2007

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

Subject: Human Health Risk Assessment Approach  
Koppers Inc., Superior, Wisconsin Facility  
BRRTs: 02-16-000484

Dear Ms. Patarcity:

This letter is to provide the Department's comments on the March 31, 2006 document titled, *Approach to Human Health Risk Assessment*.

The AMEC document outlined a process of conducting a human health risk assessment (HHRA) for areas adjacent to the Koppers facility that have become contaminated due to past practices on the facility. The process described providing to DNR a series of three technical memoranda that will detail each step, which are: 1) selection of datasets, chemicals of potential concern, and toxicity values; 2) selection of exposure scenarios, exposure pathways, and exposure parameter values; and 3) estimations of exposure point concentrations. According to the AMEC document, these three technical memoranda will be provided sequentially to DNR over a series of approximately eight weeks.

Based upon our review we believe the Approach to Human Health Risk Assessment is consistent with the applicable sections of NR 722.11 Wis. Adm. Code. Please note that NR 722.11 Wis. Adm. Code states:

Risk assessments. (1) The responsible party may request, and the department may consider granting, approval to prepare and submit a risk assessment for the purpose of developing environmental standards only if the responsible parties demonstrate to the satisfaction of the department that:

- (a) Compliance with the applicable environmental standards listed in s. NR 722.09(2) will not be protective public health, safety and welfare and the environment; or
- (b) Attaining compliance with the applicable residual contaminant levels in ch. NR 720 is not practicable.

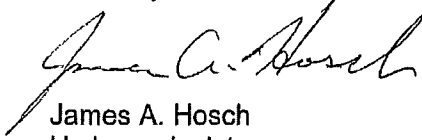
Under s. NR 722.11(2) Wis. Adm. Code states:

If the department authorizes the use of a risk assessment to develop environmental standards, the responsible parties shall utilize standard exposure assumptions approved by the department. The department may approve, modify or disapprove of the risk

assessment prepared by the responsible parties and shall provide a written explanation of the department's action to the responsible parties.

Thank you for opportunity to review the Approach to Human Health Risk Assessment. If you have any further questions, please feel free to call me at (715)-392-0802.

Sincerely,



James A. Hosch  
Hydrogeologist

cc: John Robinson – Rhinelander  
Mark Gordon – RR/3  
Jeff Holden- BBL  
Henry Nehls-Lowe - DHFS  
Bob Egan - EPA Region 5  
Brian Magee – AMEC  
Vicki Drake – Douglas County