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Via certified mail 7000 1530 0001 9503 1904

Jim Ross
Wisconsin Department of Natural Resources
810 West Maple Street
Spooner, WI 54801

RE: Koppers Inc. Superior, Wisconsin Facility
Former Wood Treating Facility Drip Pad Decommissioning

Dear Mr. Ross:

This letter is being submitted to the Wisconsin Department of Natural Resources (WDNR) by Koppers Inc. (Koppers), to transmit recently collected groundwater monitoring data for the referenced facility. At your request, Koppers' consultant installed and sampled a replacement temporary groundwater monitoring well for the abandoned temporary well TW-2, in accordance with the previously approved Work Plan, Drip Pad Closure Investigation (KU Resources, November 2006). The replacement well installation, sampling and analysis was requested by the WDNR due to the elevated naphthalene concentration detected in the original well TW-2 sample.

As indicated on the attached laboratory data sheets, the replacement well TW-2A samples show naphthalene concentrations consistent with the first round samples previously provided to you, as summarized herein.

Sample Location and Identification	Naphthalene Concentration Micrograms per liter (ug/l)
Round 1 Original TW-2	
TW-2	3,400
TW-2 field duplicate	1,200
Round 2 Replacement TW-2A	
TW-2A	1,200
TW-2A field duplicate	1,400

As you know, RCRA groundwater monitoring at the facility has been ongoing since the early 1980's. The site-wide RCRA Corrective Action Program began with a RCRA Facility Assessment report in 1988 (U.S. EPA, June 1988) and has been implemented through multiple phases of soil and groundwater studies beginning in the 1980's, that are currently ongoing. The

drip pad area where well TW-2/TW-2A was/is located falls within the targeted and site-wide historic groundwater studies. Through discussion with the former facility owner, Beazer East, Inc. (Beazer), who has been working directly with the WDNR on the site-wide RCRA Corrective Action Program, we have determined that the currently anticipated corrective action for site-wide groundwater, inclusive of the area of the drip pad, is Natural Attenuation (NA).

As additional information, the current groundwater monitoring data for other shallow wells at the facility also show similar concentrations of naphthalene as in the TW-2/TW-2A samples. Consider the following as examples.

- Shallow well W-16A trend analysis extending from July 2004 to April 2005 shows naphthalene concentrations in a range from > 7,000 ug/l to > 4,000 ug/l. This information is found in a May 5, 2006 correspondence from Blasland, Bouck & Lee, Inc. (the former owner's consultant), to the Wisconsin Department of Natural Resources (Mr. James Hosch).
- Shallow well W-10AR2 shows a naphthalene concentration of 2,000 ug/l. This information is found in a June 9, 2006 correspondence from Field & Technical Services (the former owner's consultant) to the Wisconsin Department of Natural Resources (Mr. James Hosch).

Specifically for your reference, the former owner's consultant has submitted two recent documents to the WDNR that justify and demonstrate the NA approach for groundwater.

- Blasland, Bouck & Lee, Inc., March 2004. Focused Corrective Measures Study (CMS).
- Blasland, Bouck & Lee, Inc., January 24, 2006 correspondence to Wisconsin Department of Natural Resources (Mr. James Hosch). Re: Koppers Inc. Superior, Wisconsin Facility, Summary of Supplemental Groundwater Monitoring and Natural Attenuation Evaluation.

These documents discuss and evaluate the NA rationale and approach in detail. The general rationale for NA is summarized below:

- Hydraulic conductivity at the site is very low.
- The potential for migration of constituents in groundwater is limited.
- There are no current or anticipated future exposure pathways to impacted groundwater.
- Impacted groundwater at the facility is not used or expected to be used as a potable source.
- The extent of impacted groundwater is limited, with no evidence of migration beyond the facility boundary at levels above the State standards.
- No site-related constituents have been detected in off-site, downgradient private wells.
- NA is demonstrated to be an ongoing process that has led to (and will continue to lead to) decreased concentrations of site-related constituents in groundwater over time.

Note that Beazer is currently conducting additional investigations related to supporting the proposed NA approach for groundwater that are expected to be completed in July 2007. The results of those investigations will be summarized in a report to WDNR and are anticipated to provide further support for the proposed NA approach, which will be discussed in the revised Focused CMS, also expected to be completed in July 2007.

In summary, Koppers believes that no further action is required at the drip pad as a part of its closure, for the following reasons:

- The facility groundwater, including the specific area of the drip pad, has been sufficiently studied for the past 27 plus years.
- The levels of detected naphthalene in our drip pad closure study are similar to other current shallow well samples at the site.
- NA has been proposed and appears to be the likely final corrective action for groundwater at the facility.

If you should have any questions regarding this correspondence, please do not hesitate to contact me. Unless directed otherwise, we intend to abandon the temporary well TW-2A, as required by regulation, before August. At that time we will transmit all of the appropriate well forms to you for the WDNR's records.

Sincerely,

Leslie Hyde

Cc:
Jane Patarcity – Beazer East, Inc.
Steve Willis – Koppers Superior
File