

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor
Scott Hassett, Secretary
John Gozdziński, Regional Director

Superior Service Center
1401 Tower Ave
Superior, Wisconsin 54880
Telephone 715-392-7998
FAX 715-392-7993
TTY Access via relay - 711

August 31, 2007

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

Subject: Focused Corrective Measures Study
Koppers Inc., Superior, Wisconsin Facility
BRRTs: 02-16-000484

Dear Ms. Patarcity:

This letter is to provide the Department's comments on the July 2007 revision of the document titled, Focused Corrective Measures Study. The document recommends directing water through a proposed culvert in the on-site ditch as well as a proposed soil cap for prevention of direct contact issues related to the on-site soil contamination.

Included in the Appendices is the AMEC document titled Post-Remediation Human Health Risk Assessment. Areas of capping are selected based upon risk criteria derived from this document. In general, we agree with the selection of the culvert and cap as remedies for the on-site contamination. However, we have had discussions with Henry Nehls Lowe of the Bureau of Environmental and Occupational Health, Division of Public Health, Wisconsin Dept of Health & Family Services in regards to the assessment. The outcomes of our discussions with Henry are the following comments:

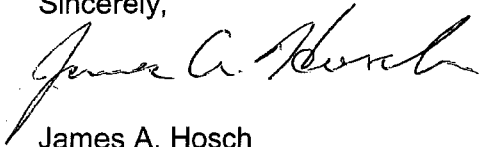
The AMEC-authored risk assessment departs from the default absorption factors (AF) provided in the 2004 U.S. EPA Risk Assessment Guidance for Superfund, Part E, Supplemental Guidance for Dermal Risk Assessment (<http://www.epa.gov/oswer/riskassessment/ragse/index.htm>) when calculating health risks associated with dermal exposures to impacted soils. This EPA guidance established an AF of 0.13 for polycyclic aromatic hydrocarbons (PAHs), and the HHRA used an adjusted AF of 0.02 for carcinogenic PAHs and 0.1 for noncarcinogenic PAHs. For pentachlorophenol, the U.S. EPA guidance also the set default AF at 0.25, while the HHRA used an adjusted AF of 0.03.

It is important to note the HHRA states that using AMEC's adjusted AFs do not change the conclusions of the HHRA for on-site remediation. However, when calculating health risks at a future date for current off-site conditions, where dermal exposure currently poses a notable health risk, substituting AMECs adjusted AFs for than EPA default factors could substantially alter remediation action levels and decisions. In light of there not being any change in conclusions we are requesting that you use the EPA's default values for the current on-site assessment. Any necessary modifications to figures, tables or text should be provided in time to maintain compliance with the agreed upon schedule.

When calculating health risks associated with dermal exposures to impacted surface waters, the HHRA also used a lower dermal permeability constant (DPC) of 0.02 cm/hr for PAHs rather than the default value in the EPA guidance of 0.7 cm/hr. The HHRA states this EPA default DPC is "flawed". Given the strong criticism of the EPA default values in the HHRA, we are consulting U.S. EPA Region V for a review and clarification. We expect a response within two weeks, and will forward their comments.

Thank you for opportunity to review the Focused Corrective Measures Study. If you have any 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