

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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May 12, 2008

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

Subject: Off-Property HHRA
Koppers Inc., Superior, Wisconsin Facility
BRRTs: 02-16-000484

Dear Ms. Patarcity:

This letter is to provide partial comments regarding the September 24, 2007 letter with the subject heading, "Off-Property Ecological and Human Health Risk Assessment Approach Memoranda, Koppers Inc. Superior, WI Facility". This letter will provide the Department's comments regarding the Off-Property Human Health Risk only. A separate letter will provide comments regarding the Off-Property Ecological Risk Assessment Approach memorandum.

"Table 3 - Absorption Adjustment Factors", proposes the use of dermal AAFs for PAHs and pentachlorophenol, which were listed as 0.1/0.02 and 0.03, which are unacceptable to the Department. Please see the Department letter of September 20, 2007 letter. In that letter we requested the on-site HHRA use EPA's default AAFs of 0.13 for all PAHs and 0.25 for pentachlorophenol. The use of EPA's default AAFs were accepted by Beazer in the AMEC letter from Allison Nightingale dated November 30, 2007.

"Table 5 - Summary of Potential Exposure Assumptions." First, there should be an exposure scenario developed specifically for "trappers," who are likely to visit this area, and could have very different exposures to affected soils, sediments, and surface waters than hunters, recreational visitors, and residents. Trappers are required by state regulations to inspect their traps on a daily basis and trapping season is also open for 4 to 5 months. Trappers are also more likely to enter the stream and come in contact and incidentally ingest sediments than casual visitors, particularly during winter months.

Second, while an exposure scenario is relevant for recreational adults visiting public lands, the impacted portions of Crawford Creek are along privately owned lands where people permanently reside. Private land owners are very likely to visit all portions of their property more than 12 times per year. We request an expansion of the adult recreational visitor to adult recreational visitor/residents, and increasing the exposure frequency up to 120 times per year, but not less than 40 visits. Perhaps both a central-tendency and reasonable-maximum exposure scenario could be developed for a recreational visitor and a property owner.

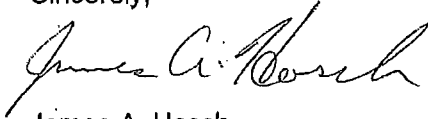
Third, for the adolescent (15-16) recreational visitor/residents, it is reasonable to expect that children who live on or near these properties will visit the creek with even greater frequency,

perhaps even daily, and their exposure frequency should reflect this. Visitation by youths to the creek is likely to increase with time with the growth of nearby residential developments. We also view that the teen age range of 15-16 years old should be changed to a child/teen age range of 7 to 18 years old, the body weight adjusted down from 56 to 48 kilograms, and the exposure duration expanded from 6 to 11 years. Finally, since younger children have greater hand-to-mouth activities, we request that the daily incidental soil and sediment ingestion rate be adjusted from 50 to 100 milligrams.

For Table 6 - "Noncarcinogenic and Carcinogenic Dose-Response Information", for 2-Methylnaphthalene the reference dose for naphthalene was substituted in ($2.0E-02$ mg/kg-day), but there is a EPA Oral Reference Dose for 2-Methylnaphthalene of $4.0E-03$ mg/kg-day, which should be used.

Thank you for opportunity to provide these additional comments regarding the Off-Property Human Health Risk Assessment Approach Memorandum. 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