

State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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

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September 10, 2008

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:

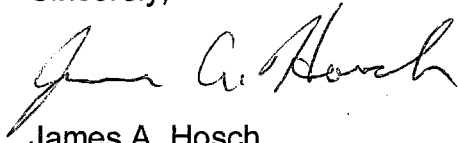
This letter is to provide the Department's conditional approval to the July 2007 revision of the document titled, Focused Corrective Measures Study provided that previous comments have been addressed and amendments to the final HHRA for the onsite remediation are made as requested by the Department. 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, and natural attenuation for groundwater not part of the RCRA unit specific monitoring program.

The comments provided in earlier correspondence in regards to natural attenuation still applies. An estimated timeframe in terms of months or years should be provided for the estimated time to obtain cleanup through natural attenuation based on existing data.

Areas of capping were selected based upon risk criteria derived from this document. Included in the Appendices is the AMEC document titled Post-Remediation Human Health Risk Assessment. Our previous correspondence requested modifications to the risk calculations. In general, we agree with the selection of the culvert and cap as remedies for the on-site contamination. We are conditionally approving a conceptual remedy to include a cap (surface cover), proposed culvert, and natural attenuation for the onsite contamination. A Design Report and Design Plans and Specifications shall be submitted in accordance with NR 724.09 and NR 724.11 Wisconsin Administrative Code. Appropriate and complete permit applications for construction permit should be submitted to the Department in the fall for construction in the summer of 2009.

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,

A handwritten signature in black ink, appearing to read "James A. Hosch". The signature is fluid and cursive, with the first name being the most prominent.

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