



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Scott Walker, Governor
Cathy Stepp, Secretary

Ashland Service Center
2501 Golf Course Road
Ashland, Wisconsin 54806
Telephone 715-685-2900
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June 11, 2014

MS JANE PATARCITY
THREE RIVERS MANAGEMENT INC
MANOR OAK CIRCLE SUITE 200
1910 COCHRAN RD
PITTSBURGH PA 15220

Subject: Supplemental Off-Property Investigation Summary Report for the Former Koppers, Inc.
Facility, Superior, Wisconsin
WDNR BRRTS #02-16-000484

Dear Ms. Patarcity:

The Department of Natural Resources' Remediation and Redevelopment program has received the *Supplemental Off-Property Investigation Summary Report*, prepared for the above named site by ARCADIS and dated April 15, 2014. This report summarizes the results of additional soil and groundwater investigation performed in the summer and fall of 2013 and in January 2014 in the Crawford Creek floodplain upstream of the railroad embankment.

Based on a review of this report and the results of previous investigations, it appears that you have defined the degree and extent of contamination upstream of the Wisconsin Central Ltd. railroad embankment sufficiently to begin the corrective measures planning process for that area. We encourage you to proceed with the corrective measures study at your earliest convenience.

One issue that the Department believes warrants further evaluation as you move ahead with the planning and implementation of corrective measures is the degree of correlation between visually un-impacted floodplain material and the compliance of that material with applicable cleanup standards. We would have concerns with an overreliance on visual observations during remedial activities and the resultant potential for environmentally significant concentrations of site-related contaminants not being addressed through the corrective measures process. Because of that, we feel the need to point out that additional characterization may be needed to support remedial design. We hope to have further discussions with you and your consultants on this issue as we move forward.

Your continued cooperation in addressing the contamination at this site is greatly appreciated. If you have any questions concerning this letter or the project in general, please do not hesitate to write or call me at 715-685-2920. I can also be reached by e-mail at Christopher.Saari@Wisconsin.gov.

Sincerely,

Christopher A. Saari
Hydrogeologist

cc: Dave Bessingpas – ARCADIS
Jeff Holden – ARCADIS
Stuart Messur – Anchor QEA
Mark Thimke – Foley & Lardner LLP
John Robinson – DNR Wausau
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