

Mr. Christopher Saari  
Wisconsin Department of Natural Resources  
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Ashland, WI 54806

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Subject:  
Bimonthly Progress Report – September and October 2017  
Former Koppers Inc. Superior, WI Facility  
WID 006-179-493

ENVIRONMENT

Dear Mr. Saari:

Date:  
November 8, 2017

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of September and October 2017 for the Former Koppers Inc. Facility in Superior, Wisconsin. This report is prepared in compliance with Wisconsin's Hazardous Waste Facility Investigations Guidelines and the facility Part B Permit. If you have any comments or questions concerning this progress report, please contact Ms. Jane Patarcity of Beazer at 412.208.8813 or me at 218.208.3427.

Contact:  
David Bessingpas

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Sincerely,

Our ref:  
B0039286.2017

Arcadis U.S., Inc.



David Bessingpas  
Sr. Project Manager

Copies:  
John Robinson, WDNR  
Judy Fassbender, WDNR  
Jane Patarcity, Beazer

Linda Paul, Koppers  
Steve Willis, Koppers  
Paul Anderson, Arcadis

**Bimonthly Progress Report  
September and October 2017**

Former Koppers Inc. – Superior, WI Facility  
WID 006-179-493

**A. Current Activities**

On September 12, 2011, Beazer submitted a Construction Documentation Report for the completed on-property corrective measures. WDNR issued a conditional approval of the report on October 21, 2011, but withheld final approval pending Beazer's submittal of an acceptable continuing obligations/GIS Registry package. A Notification of Continuing Obligations and Residual Contamination was submitted to the current property owner on June 16, 2014. A GIS Registry package was submitted to WDNR on August 5, 2015. Final WDNR approval of the on-property corrective measures is pending.

On May 12, 2016, Beazer, WDNR, and USEPA participated in a meeting to continue discussions regarding a GLLA project for the off-property portion of the Site. As an outcome of the May 12 meeting, on August 15, 2016, Beazer submitted to USEPA a draft GLLA project application for an FFS. On October 10, 2016, Beazer submitted a draft outline/table of contents for the FFS, and on October 11, 2016, a conference call was held to discuss the draft project application and FFS outline/table of contents. A meeting to continue discussions regarding the potential GLLA project was held on November 29, 2016. Minutes from the November 29, 2016 meeting were finalized and distributed to the meeting attendees on January 30, 2017. Beazer, USEPA, and WDNR participated in follow-up conference calls on January 13 and 27, 2017. Based on feedback received from USEPA and WDNR, Beazer revised the GLLA project application and resubmitted a revised draft to USEPA on January 6, 2017. The application was subsequently revised to address additional agency comments and resubmitted to USEPA on January 26 and February 23, 2017. The February 23<sup>rd</sup> submittal represents the final GLLA application. On April 27, 2017, Beazer presented the proposed GLLA FFS project to the USEPA Great Lakes National Program Office Technical Review Committee (WDNR participated by phone). Beazer and USEPA are currently preparing a Project Agreement for the GLLA FFS project.

As another outcome of the May 12 meeting, on July 7, 2016, Beazer submitted to WDNR a letter regarding non-hazardous waste determination for sediments and soils that may be managed in the off-property portion of the Site as part of future corrective actions. On July 12, 2016, WDNR requested additional information regarding other sites where similar waste determinations were accepted. Beazer submitted the requested information to WDNR in a letter dated November 1, 2016. In a letter dated November 28, 2016, WDNR provided copies of Hazardous Waste Annual Reports and Hazardous Waste Manifest Records for Beazer's consideration. On February 7, 2017, Beazer submitted a response to WDNR's November 28 letter.

**Bimonthly Progress Report  
September and October 2017**

Former Koppers Inc. – Superior, WI Facility  
WID 006-179-493

As documented in a June 22, 2017 letter from FTS to the WDNR, during the April 2017 semiannual groundwater monitoring event, the inner casing at monitoring well W-04AR was reported to be damaged, and the well could not be sampled. On July 24, 2017, the condition of W-04AR was further assessed, and it was determined that the well could not be repaired. Accordingly, the well was abandoned in place, and a replacement well (W-04AR2) was installed. The new well was developed on August 21, 2017. Documentation and forms for the abandoned and newly installed monitoring wells was submitted to WDNR on September 15, 2017.

FTS conducted the second semiannual groundwater monitoring event in October 2017.

**B. Summary of Findings**

See Section I below.

**C. Schedule**

No schedule updates were submitted during this reporting period.

**D. Progress**

Refer to Sections A and C of this report.

**E. Problems Encountered**

No problems were encountered this reporting period.

**F. Corrective Action**

No corrective actions were required this reporting period.

**G. Project Personnel**

No changes to project personnel occurred during this reporting period.

**H. Response to Agency Comments on RFI Reports**

No responses to agency comments were submitted during this reporting period.

**Bimonthly Progress Report  
September and October 2017**

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WID 006-179-493

**I. Reports Submitted to the Agency**

On September 9, 2017, FTS submitted to WDNR the *Summary of 2017 Sign Inspection Activities*.

On September 15, 2017, Arcadis submitted to WDNR documentation and forms for the abandoned well W-04AR and new, replacement well W-04AR2.

**J. Projected Work for the next Reporting Period**

Beazer and USEPA will continue preparing a Project Agreement for the GLLA FFS project.