

Mr. Christopher Saari  
Wisconsin Department of Natural Resources  
2501 Golf Course Road  
Ashland, WI 54806

Arcadis U.S., Inc.  
430 First Avenue North, Suite 720  
Minneapolis  
Minnesota 55401  
Tel 218 208 3427  
[www.arcadis.com](http://www.arcadis.com)

Subject:  
Bimonthly Progress Report – September and October 2018  
Former Koppers Inc. Superior, WI Facility  
WID 006-179-493

ENVIRONMENT

Dear Mr. Saari:

Date:  
November 20, 2018

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of September and October 2018 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

Phone:  
218.208.3427

Email:  
david.bessingpas  
@arcadis.com

Sincerely,

Our ref:  
B0039286.2018

Arcadis U.S., Inc.



David Bessingpas  
Project Manager

Copies:  
Judy Fassbender, WDNR  
Linda Paul, Koppers  
Steve Willis, Koppers  
Jane Patarcity, Beazer

**Bimonthly Progress Report  
September and October 2018**

Former Koppers Inc. – Superior, WI Facility  
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**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 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.

Beazer and USEPA continued to work on the Great Lakes Legacy Act (GLLA) Focused Feasibility Study (FFS) project for the off-property portion of the Site during this reporting period. GLLA project-related activities conducted during this reporting period included the following:

- Beazer, USEPA, and WDNR participated in monthly project team conference calls on September 10 and October 9, 2018. Call minutes were finalized and distributed on October 8 and November 6, 2018, respectively.
- Beazer completed a wetland delineation in Sub-Areas A through C. Beazer was unable to obtain the property access necessary to complete wetland delineation in Sub-Area D.
- Beazer submitted the project analytical database and historical documents to USEPA.
- Beazer prepared a draft project communications plan.

**B. Summary of Findings**

See Section I below.

**C. Schedule**

No schedule updates were submitted during this reporting period.

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**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.

**I. Reports Submitted to the Agency**

No reports were submitted during this reporting period.

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

Beazer and USEPA will continue to work on the GLLA FFS project, including participating in monthly update calls with WDNR and a kick-off meeting for the data gap evaluation task.