

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

Subject:
Bimonthly Progress Report – January and February 2019
Former Koppers Inc. Superior, WI Facility
WID 006-179-493

ENVIRONMENT

Dear Mr. Saari:

Date:
March 7, 2019

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of January and February 2019 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:
B0039286.2019

Arcadis U.S., Inc.



David Bessingpas
Project Manager

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

**Bimonthly Progress Report
January and February 2019**

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 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 project team conference calls on January 14, February 11, and February 25, 2019.
- Minutes from the December 10, January 13 and February 11 calls were finalized and distributed on January 29, February 11 and February 26, respectively.
- On January 16, 2019, Arcadis uploaded additional historical documents and a copy of the December 19, 2018 meeting presentation slides to the project One Drive.
- On January 17, 2019, Beazer provided comments on the draft Secondary QAPP.
- USEPA provided GLSED database files for the Beazer and 2014 GLNPO data sets to Jacobs on February 8 and 11, respectively.
- On February 11, 2019, Arcadis distributed finalized minutes from the December 19, 2018 data gap evaluation kick-off meeting.
- On February 15, 2019, USEPA submitted a revised Secondary QAPP and Data Evaluation Criteria Technical Memo.
- On February 22, 2019, Arcadis submitted a draft conceptual site model for review by the project team.

**Bimonthly Progress Report
January and February 2019**

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

- On February 22, 2019, Jacobs submitted a draft project schedule for review by the project team.

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.

I. Reports Submitted to the Agency

On January 24, 2019, FTS submitted the *2018 RCRA Annual Groundwater Monitoring Report*.

On January 30, 2019, Arcadis submitted the NR700 semi-annual progress report.

J. Projected Work for the next Reporting Period

Beazer and USEPA will continue to work on the GLLA FFS project, including participating in bi-weekly update calls with WDNR.