

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

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

ENVIRONMENT

Dear Mr. Saari:

Date:  
May 20, 2019

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

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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  
March and April 2019**

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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.

FTS conducted the first 2019 semiannual groundwater monitoring event during the week of April 29, 2019.

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 March 11, March 21, March 25, April 1, April 8, and April 22, 2019. Draft minutes for these calls were submitted to the project team for review/comment, and were finalized and distributed on April 1 (March 11 call), April 19 (March 21, March 25, and April 1 calls), and May 3, 2019 (April 8 and April 22 calls).
- On March 3, 2019, Jacobs submitted final versions of the Secondary QAPP and Data Evaluation Criteria Technical Memorandum.
- On March 7, 2019, Beazer/Arcadis provided comments on the February 25, 2019 draft data gap evaluation project schedule prepared by Jacobs.
- On March 11, 2019, Jacobs submitted an initial draft Secondary QAPP Table 1 (usability evaluation of existing data set).

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- On March 18, 2019, Jacobs submitted a table of proposed generic criteria to use for evaluating analytical method sensitivity of the existing data.
- On March 20, 2019, Jacobs submitted a revised data gap evaluation project schedule.
- On March 21, 2019, Beazer/Arcadis provided comments on the March 11, 2019 initial draft Secondary QAPP Table 1 and March 18, 2019 proposed generic criteria, prepared by Jacobs.
- On March 25, 2019, Jacobs submitted the initial draft results of the screening of reporting/detection limits for the existing data against the generic criteria.
- On March 25, 2019, Jacobs submitted a revised data gap evaluation project schedule.
- On March 27, 2019, Jacobs submitted revised draft results of the screening of reporting/detection limits of the existing data against the generic criteria.
- On April 1, 2019, Jacobs submitted revised draft results of the screening of reporting/detection limits of the existing data against the generic criteria, and an updated Secondary QAPP Table 1.
- On April 8, 2019, Beazer/Arcadis provided comments on the April 1, 2019 updated Secondary QAPP Table 1 prepared by Jacobs.
- On April 16, 2019, Jacobs submitted a final Secondary QAPP Table 1.
- On April 22, 2019, Jacobs submitted a draft Data Gap Evaluation Summary Table.
- On April 29, 2019, Beazer/Arcadis provided initial comments on the April 22 draft Data Gap Evaluation Summary Table prepared by Jacobs.

**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.

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**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 bi-weekly update calls with WDNR, and a project team meeting in Milwaukee on May 17, 2019.