

Mr. John Sager  
Wisconsin Department of Natural Resources  
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Superior, WI 54880

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

ENVIRONMENT

Dear Mr. Sager:

Date:  
July 11, 2019

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of May and June 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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218.208.3427

Email:  
david.bessingpas  
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Sincerely,

Our ref:  
B0039286.2019

Arcadis U.S., Inc.



David Bessingpas  
Project Manager

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

**Bimonthly Progress Report  
May and June 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.

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 (and their consultants, Arcadis and Anchor QEQ), USEPA (and their contractor, Jacobs), and WDNR participated in project team conference calls on May 6, June 3, and June 17, 2019. Draft minutes for these calls were submitted to the project team for review/comment, and were finalized and distributed on June 3 (May 6 call) and June 28 (June 3 call); minutes from the June 17 call have not yet been finalized.
- On May 2, 2019, Jacobs submitted an initial draft *Crawford Creek and Tributary Data Gap Evaluation Technical Memorandum (DGTm)*.
- On May 14, 2019, Beazer submitted comments on the initial draft DGTm.
- On May 17, 2019, Beazer (and their consultants, Arcadis and Anchor QEA), USEPA (and their contractor, Jacobs), and WDNR participated in a project team meeting in Milwaukee to discuss the draft DGTm and Beazer's comments. Draft minutes for the meeting were submitted to the project team for review/comment, and were finalized and distributed on June 17, 2019.
- On May 20, 2019, Jacobs submitted a revised draft DGTm.

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- On June 5, 2019, Beazer submitted comments on the revised draft DGTM.
- On June 6, 2019, WDNR submitted comments on the revised draft DGTM.
- On June 17, 2019, WDNR submitted a revised data gap evaluation project schedule.
- On June 19, 2019, Jacobs submitted a revised/final DGTM.

**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**

John Sager has been assigned as the new WDNR Project Manager.

**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 June 19, 2019, FTS submitted the *First Semi-Annual RCRA Groundwater Monitoring Results* to WDNR.

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**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 preparing a supplemental data gap investigation Work Plan and QAPP.