

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

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

ENVIRONMENT

Dear Mr. Sager:

Date:
October 1, 2019

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

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Sincerely,

Our ref:
30004673

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
July and August 2019**

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 (and their consultants, Arcadis and Anchor QEQ), USEPA (and their contractor, Jacobs), and WDNR participated in project team conference calls on July 1, July 29, and August 12, 2019. Draft minutes for project team conference calls were submitted to the project team for review/comment, and were subsequently finalized and distributed on July 22 (June 17 call), July 29 (July 1 call), September 9 (July 29 call), and September 22 (August 12 call).
- On July 1, 2019, Beazer submitted comments on the June 19, 2019 *Crawford Creek and Tributary Data Gap Evaluation Technical Memorandum* (DGTM).
- On July 10, 2019, Jacobs submitted a final version of the DGTM.
- On July 23, 2019, Arcadis submitted an updated Communications Plan.
- On August 2, 2019, Arcadis submitted a draft *Supplemental Data Gap Investigation Work Plan* (DGI Work Plan) and draft *Supplemental Data Gap Investigation Quality Assurance Project Plan* (DGI QAPP).
- On August 15, 2019, WDNR submitted comments on the draft DGI Work Plan.
- On August 20, 2019, USEPA submitted comments on the draft DGI QAPP.
- On August 21, 2019, Jacobs submitted comments on the draft DGI Work Plan and QAPP.

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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 project personnel changes 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 July 9, 2019, Arcadis submitted the NR700 semi-annual progress report to WDNR.

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, finalizing a supplemental data gap investigation Work Plan and QAPP, and initiating supplemental data gap investigation field activities.