

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

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

ENVIRONMENT

Dear Mr. Sager:

Date:
November 20, 2019

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

FTS conducted the second semiannual groundwater monitoring event in October 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 (and their consultants, Arcadis and Anchor QEQ), USEPA (and their contractor, Jacobs), and WDNR participated in project team conference calls on September 3, September 9, September 23, October 7, and October 21, 2019. Draft minutes for project team conference calls were submitted to the project team for review/comment, and were subsequently finalized and distributed on September 22 (September 3 and 9 calls), October 21 (September 23 and October 7 calls), and November 12 (October 21 call).
- On September 3, 2019, Arcadis submitted a revised draft *Supplemental Data Gap Investigation Work Plan* (DGI Work Plan) and responses to comments.
- On September 6, 2019, Arcadis submitted a revised draft *Supplemental Data Gap Investigation Quality Assurance Project Plan* (DGI QAPP) and responses to comments.
- On September 10, 2019, Jacobs submitted comments on the revised draft DGI QAPP.
- On September 10, 2019, Arcadis responded to Jacob's September 10 comments on the revised draft DGI QAPP.
- On September 17, 2019, Arcadis submitted final versions of the DGI Work Plan and DGI QAPP.

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Beazer planned to conduct the DGI field work in October and November 2019, but was unable to obtain permission from all of the requisite property owners. Accordingly, Beazer and USEPA decided to postpone the DGI field work until spring 2020.

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 September 17, 2019, Arcadis submitted final versions of the DGI Work Plan and DGI QAPP.

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. It is anticipated that certain FFS report preparation tasks may be initiated while the DGI field investigation activities are on hold until spring 2020.