

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

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Subject:
Bimonthly Progress Report – January and February 2020
Former Koppers Inc. Superior, WI Facility
WID 006-179-493
BRRTS 02-16-000484

ENVIRONMENT

Dear Mr. Sager:

On behalf of Beazer East, Inc. (Beazer), Arcadis is submitting the Bimonthly Progress Report for the period of January and February 2020 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.

Sincerely,

Arcadis U.S., Inc.



David Bessingpas
Project Manager

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

Date:
March 20, 2020

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30043905

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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. During a February 24, 2020 conference call, WDNR stated that they don't disagree with Beazer's non-hazardous waste determination, but that they will not formally concur with it either. WDNR is looking into options for responding to disposal facility requests for regulatory agency written confirmation of waste characterization.

On December 19, 2019, WDNR submitted a Hazardous Waste Compliance Assessment Request for Information to Beazer. On February 14, 2020, Beazer submitted a response to Item No. 2 and a portion of Item No. 7 from the December 19 request. Beazer is currently preparing a response to the remaining items from the December 19 request.

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 QEA), USEPA (and their contractor, Jacobs), and WDNR participated in project team conference calls on January 6, February 12 and February 24, 2020. Draft minutes for project team conference calls were submitted to the project team for review/comment.
- Arcadis provided comments on the draft FFS schedule (dated November 25, 2019) on January 6, 2020.
- Jacobs submitted a revised draft FFS schedule on January 7, 2020.
- Arcadis issued final minutes from the December 10, 2019 FFS Kick-Off Meeting on January 7, 2020.
- Arcadis provided draft conceptual site model figures for the FFS on February 18, 2020.

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- Arcadis provided a draft Wetland and Water Body Delineation Report for project team review on February 26, 2020.
- Jacobs provided draft text and tables for FFS Sections 1, 2, 8 and 11 for project team review on February 28, 2020.
- Arcadis provided draft text and figures for FFS Section 3 for project team review on February 28, 2020.
- Arcadis sent out revised access agreements for the Data Gap Investigation field work anticipated to be conducted in 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 January 7, 2020, Arcadis submitted the NR 700 Semi-Annual Site Progress Report for July-December 2019.

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On February 19, 2020, FTS submitted the *2019 RCRA Annual Groundwater Monitoring Report and Summary of 2019 Sign Inspection Activities* to WDNR.

Refer to Section A above for a list of document submittals related to the GLLA FFS project.

J. Projected Work for the next Reporting Period

Beazer will continue preparation of a response to WDNR's December 19, 2019 Hazardous Waste Compliance Assessment Request for Information.

Beazer and USEPA will continue to work on the GLLA FFS project, including participating in bi-weekly update calls with WDNR, continuing FFS report preparation tasks, and preparing for the Data Gap Investigation field work.